UNDRESSING THE DRESS CODES: AN ANALYSIS OF GENDER IN HIGH SCHOOL DRESS CODE POLICIES

A Thesis

Presented to the faculty of Graduate and Professional Studies in Education

California State University, Sacramento

Submitted in partial satisfaction of
the requirements for the degree of

MASTER OF ARTS

in

Education

(Behavioral Science Gender Equity Studies)

by

Jaymie Arns

FALL
2017

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Abstract

of

UNDRESSING THE DRESS CODES: AN ANALYSIS OF GENDER IN HIGH SCHOOL DRESS CODE POLICIES

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Statement of Problem

Considered to be inherently sexual, the female body faces unique and disproportionate amounts of policing that their male peers do not (Whisner, 1982). In the educational setting, female students are required to take additional steps to ensure that they are not disrupting the learning environment at school (Glickman, 2016). These additional steps are laid out in educational policies like dress codes, which state the dress code rules, the rationales for those dress code rules, and the sanctions attached to dress code violations. Female bodies are unable to "automatically conform to standards based on male bodies that require a certain minimum level of skin coverage, ban certain parts of the body from exposure, or bans particular garments worn almost exclusively by women" (Glickman, 2016, p. 272). School dress codes aim to reduce disruption by removing the stimulus that is causing the distraction. However, when the distraction is the female body, girls are faced with the undue

burden of conforming to gender restrictive dress codes that aim to desexualize their bodies by sexualizing them.

Sources of Data

The goal of this study was to examine 56 California high school handbooks to determine what the rationales for dress code policies are, what the sanctions attached to dress code violations are, and how many of the dress code rules target students based on their gender, race, and/or class. In order to obtain a substantial amount of data for the study, the researcher chose a qualitative content analysis of high school dress codes, without human subjects or testing. The researcher was primarily interested in the rhetoric used in high school student handbooks surrounding dress code policies and sanctions. Because of this, the handbooks themselves served as the data for this study. The purpose of this work was to provide a comprehensive look into dress code policies to determine if said policies perpetuate gender inequality in education. The use of qualitative content analysis provided the researcher with new insights surrounding dress code policies and increased their understanding of the policies in the greater social context (Krippendorff, 2013).

Conclusions Reached

Content analysis of the 56 California high school dress code policies found that the rules and rationales disproportionately target students based on their race and gender. The sanctions attached to dress code violations result in lost instruction time, which means that students are losing valuable learning time because of their

appearance. Girls of color, boys of color, and white girls are further oppressed and marginalized through the dress code policies and enforcement of said policies. It is easy to think the solution to the problem is for students to just follow the rules, but as this study has demonstrated, the rules are quite subjective. According to the Natomas High School student handbook, "Administrators will use their own discretion in deciding what is disruptive to the educational environment" (p. 15). High school administrators, then, have the green light to write, create, and enforce dress code rules based on their own subjective views of what is disruptive to the learning environment. It is the researcher's conclusion that dress codes work to preserve the status quo and ensure that marginalized students remain oppressed.

_____, Committee Chair
Sherrie Carinci, Ed.D.

_____
Date

DEDICATION

This thesis is dedicated to my amazing support system and biggest ally—my husband, Christopher. His love and encouragement guided me through the moments when I thought it would be physically impossible to write another word or complete another deadline. He gave me the inspiration I needed in those moments to push through because he knew that I would excel. This thesis is also dedicated to my remarkable four-year-old daughter, Camille. I spent many nights and weekends driving away from our home, watching her wave at me through the front window, all so I could go to the library or coffee shop to work. When she is grown and leaving for college, she will remember her mommy as a student and know the sacrifices I made to complete my education. I am proud that she witnessed what it took for me to successfully complete both my undergraduate and graduate degrees. Aside from creating my family, my education is the most important and meaningful thing I have ever done.

ACKNOWLEDGEMENTS

This work would not have been possible without the support and guidance from some amazing women. I would like to thank Dr. Carinci for not only her advice and direction as my thesis advisor, but also as a mentor. It is because of her I was able to complete my thesis on time and also gain the opportunity to teach my first college class. Additionally, I would like to thank my undergraduate mentor, Dr. Sujatha Moni, who taught me the value and meaning of creating new ideas supported by strong, academic evidence. I would also like to thank my friend, Aisha Engle, for naming my thesis. "Undressing the Dress Codes" was her creative genius and it has stuck with me since that rainy day we were working on our IRBs together. Lastly, I would like to thank all of the amazing teachers, classmates, and friends that made this experience worthwhile in so many ways.

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Chapter 1

INTRODUCTON

In the movie, *Pretty Woman,* the film's protagonist, Vivian Ward, is a prostitute in Hollywood who is mistreated and disrespected when in her street-walking clothes. While under the employment of a rich man, she learns how to act and dress "like a lady" (Milchan & Marshall, 1990). The increase in her cultural capital positively changes how Ward is treated in society, illustrating that modesty is considered valuable. Devils Lake High School principal, Ryan Hanson thought that *Pretty Woman* was a useful educational tool. The North Dakota high school called a mandatory assembly in late 2014 for their female students after there had been more than 30 dress code violations that day and showed clips of the movie, *Pretty Woman,* to demonstrate to young girls why they should not dress like prostitutes (Chumley, 2014). Examples like this are riddled throughout the media, where teenage girls are shamed for having bodies that society has labeled sexual. It is through gender restrictive dress codes that schools regulate a female student's appearance in order to manage male student's behavior, therefore legitimating the sexual objectification of women and girls (Whisner, 1982).

Media and school are powerful agents of socialization. At a very early age, children become aware of their gender differences. These differences are created and maintained through the systematic process of gender socialization (Lips, 1989; Schafer, 2010). The media, through films like *Pretty Woman*, shows that looking young and beautiful are the tickets to success for women (Wood, 2009). The

classroom is brimming with double standards for male and female students (American Association of University Women [AAUW], 1992). These double standards act as powerful socialization tools, where schools' gendered rules contribute to the remarkable decrease in self-esteem for girls once they reach middle school (Carinci, 2009). Middle school is also the time when girls' bodies begin to be sexualized and objectified. Clothing deemed appropriate for fifth graders is labeled inappropriate for sixth graders (Orenstein, 2014). Gendered dress codes in middle school and high school mean that female students must change their behavior and dress based on the effects that their bodies have on male students and faculty (Whisner, 1982).

The objectification of girls' bodies remains a constant, while the rules that enforce such objectification are fluid. It was not until the 1970s that girls were allowed to wear pants to school. In the 1973 *Johnson v. Joint School Dist. No. 60* case, the school district argued that female students wearing pants would negatively affect the morals of the students and the educational process. They contended that girls wearing pants would create safety hazards, a greater amount of physical contact between female and male students, and promote disobedience (Whisner, 1982). According to Whisner (1982), the school district "sensed social chaos resulting from a breakdown in gender distinction by dress; girls in pants were threatening" (p. 103). Schools that did allow girls to wear jeans had detailed rules regarding where the pants opened. If they opened in the front, that opening must be covered, indicating that there was something insolent about a girl's zipper (Whisner, 1982).

Today, the message that girls' bodies are offensive and in need of discipline is as prevalent as ever. Gendered dress codes show young girls that they are not in control of their bodies – the school is, while also sending the contradictory message that they must manage their bodies in a way that male students are not required to do (Morris, 2005). As the Department of Education demonstrates in its effort to include parents in the decision making process to implement dress codes and uniforms, the students are left out of this decision, showing once again that they do not have control over their bodies (DaCosta, 2006). According to the AAUW (1992), "We need to help all children, particularly girls, to know and believe that their bodies are their own to control and use as they feel appropriate—and not objects to be appropriated by others" (p. 235). Gender restrictive dress codes do not promote the AAUW's concept.

The message gendered dress codes send is that a female student's sexuality must be controlled. According to Western patriarchal society, it is through her dress that a female shows she is sexual (Whisner, 1982). However, as Whisner (1982) points out, "it is the viewer's reaction to the viewed that determines what is too sexual" (p. 112). It is through gendered dress codes that schools regulate a female student's appearance in order to manage male student's behavior, therefore legitimating the sexual objectification of women and girls. Schools contend that it is their job to contextualize female sexuality by deciding what it too sexual for the classroom. The school's motives for keeping sex out of the classroom are rarely examined (Whisner, 1982).

As Morris' (2007) field study of a middle school in Texas suggests, race plays a factor in the determination of which students are deemed too sexual. Black girls at Matthew's Middle School were often perceived as unladylike, which was attributed to them being seen as prematurely adult, and therefore too sexually mature (Morris, 2007). According to Morris (2007), the "perceived over-active and overly mature sexuality stands in contrast to dominant proscriptions of ladylike restriction of sexuality" (p. 507). Morris (2007) goes on to state that "some teachers attempted to dissuade Black girls at the school from wearing overly provocative 'hoochie mama' clothing, seen as a mark of inappropriate, overly sexualized femininity" (p. 507). In other words, the teachers at Matthews viewed Black girls as too sexual because of the type of femininity that they perceived them as expressing and tried to control their bodies through dress codes. Morris (2007) concluded that race shaped the perception of femininity. Even when white girls and Latinas broke the dress code, they were not seen as too sexually mature because the school officials' perception of their femininity was different (Morris, 2005).

At a very young age, children become aware of their gender roles and how to perform proscribed masculinities and femininities. This awareness is a result of gender socialization, where family, peers, media, and school are powerful agents of socialization. In the classroom, double standards act as socialization tools, where male and female students are assigned different rules, both in overt and covert curricula. Gendered dress codes are a prime example of double standards, where, in an effort to desexualize young girls, schools are actually sexualizing them (Whisner, 1982). This

contributes to the objectification of women and girls and places a heavy burden on them – girls are responsible for changing their behavior based on effects their newly sexualized bodies have on male students and faculty.

Statement of the Problem

Considered to be inherently sexual, the female body faces unique and disproportionate amounts of policing that their male peers do not (Whisner, 1982). In the educational setting, female students are required to take additional steps to ensure that they are not disrupting the learning environment at school (Glickman, 2016). These additional steps are laid out in educational policies like dress codes, which state the dress code rules, the rationales for those dress code rules, and the sanctions attached to dress code violations. Female bodies are unable to "automatically conform to standards based on male bodies that require a certain minimum level of skin coverage, ban certain parts of the body from exposure, or bans particular garments worn almost exclusively by women" (Glickman, 2016, p. 272). School dress codes aim to reduce disruption by removing the stimulus that is causing the distraction. However, when the distraction is the female body, girls are faced with the undue burden of conforming to gender restrictive dress codes that aim to desexualize their bodies by sexualizing them.

Purpose of the Study

The purpose of this work is to examine the rules, rationales, and sanctions within 56 California high school dress code policies to determine if they perpetuate gender disparities in education. Because dress and gender roles are intimately

connected, it is important to look at the rhetoric used in high school dress code policies to ascertain whether or not girls are being unfairly targeted. According to Paff and Lakner (1997), "Gender differences in dress are used in the societal construction and reproduction of gender and gender roles" (p. 31). Since dress perpetuates the social construction of gender and gender roles, then high school dress codes that unfairly target and sexualize the female body are perpetuating the role of women and girls as sexual objects. Inequitable dress code policies that disproportionately target and, therefore, negatively affect already marginalized students, such as girls, perpetuate hegemonic values and preserve gender inequality in education (Glickman, 2016). The researcher will employ content analysis methodology to answer the following research questions: What are the rationales given to substantiate high school dress code policies? What are the sanctions connected to dress code violations? How many dress code rules target students based on their gender, race, and/or class?

Methodology

Qualitative research is the collection and analysis of data based on words or pictures to explain the central phenomenon being studied. In qualitative research, the data should be analyzed to formulate answers to the research questions (Creswell, 2015). The process of answering the research questions requires the researcher to perform a thematic analysis. A thematic analysis allows the researcher to develop categories or themes from the data (Creswell, 2015). According to Creswell (2015), "Describing and developing themes from data consists of answering the major

research questions and forming an in-depth understanding of the central phenomenon through description and thematic development" (p. 246). For this reason, content analysis methodologies were employed to examine 56 high school handbooks and determine what the rationales for dress code policies are, what the sanctions attached to dress code violations are, and how many of the dress code rules target students based on their gender, race, and/or class. According to Babbie (1998), content analysis is "the analysis of communications" where "researchers examine a class of social artifacts, typically written documents" (p. 308). Not only does the concreteness of the student handbooks strengthen the reliability of this study (Babbie, 1998), but because of the specialized procedures involved in the data collection and analysis, content analysis "is learnable and divorceable from the personal authority of the researcher" and therefore a "scientific tool" (Krippendorff, 2013, p. 24).

This study consisted of qualitative data from content analysis of 56 California high schools' 2016/2017 student handbooks. The investigator gathered handbooks that were publicly accessible via the Internet through a Google search using the keywords "high school," "student handbook," and "California;" and randomly selected 75 to analyze. Criteria for the selection process were that the handbooks be from the 2016/2017 school year, that they were from public schools, and that the dress code policies did not employ a uniform policy. Of the 75 handbooks randomly chosen, 19 were eliminated because they were either missing a dress code rationale, dress code rules, or dress code sanctions. The investigator drew conclusions based on the rationales given for the dress code policies, dress code sanctions attached to dress code

violations, and targeted student demographics to determine if dress code policies perpetuate gender inequality in education.

Because content analysis is, in essence, a "coding operation," the data was analyzed by coding both the manifest content and the latent content (Babbie, 1998, p. 313). Manifest content is defined as "the visible, surface content" (Babbie, 1998, p. 313). In order to determine the rationales for dress code policies and their connected sanctions, the researcher coded the manifest content by counting the number of times certain words appeared. The researcher also coded the latent content, which Babbie (1998) defines as "its underlying meaning" (p. 313). This method of analysis was utilized when coding the specific dress code rules. Because the rules are formatted in a way that appears to be gender neutral, the researcher needed to examine and code the concealed content. In this way, the reading and coding of texts resonated with the analyst's background in gender equity (Krippendorff, 2013). The findings were reported using a narrative discussion to provide a detailed summary of the findings from the data analysis. The data was interpreted by summarizing the findings, including personal reflections, making comparisons to the literature, and offering limitations and suggestions for future research (Creswell, 2015).

In order to check the findings and provide validity, reliability, and trustworthiness, the researcher compiled random samplings of their coding processes and had them checked by an educator employed in the California State University, Sacramento's College of Education. This process accounted for bias and ensured the validity of the coding procedures. Additionally, the study appealed to social validity

in order to prove that the findings were truthful. Because this study addressed an important social concern, and therefore added to the public discussion of dress code policies, this study was socially validated (Krippendorff, 2013). Both opponents and proponents of high school dress codes can validate this research, which examines a public issue, because they are concerned about these issues and are committed to finding a solution to gender restrictive dress codes by translating these research findings into action (Krippendorff, 2013).

Limitations

The limitations of the study include the sample size and the methodology. Not every California high school had their student handbooks publicly accessible, which had an effect on the sample size. Additionally, even when a student handbook was available to the public, it was not always the most up to date version. Because this study is a content analysis, the researcher only analyzed the policies, not the implementation of said policies. Whether or not high school administrators and teachers followed the guidelines set forth in the handbooks was unknown. In addition to the sample size and methodology, the researcher acknowledged that they were "working within hermeneutic circles in which their own socially or culturally conditioned understandings constitutively participate" in the analysis and interpretation of the data (Krippendorff, 2013, p. 23). The researcher's background in Women and Gender Studies made it impossible to be completely unbiased. Additionally, the researcher's standpoint as a white woman implicitly influenced their interpretation of the findings.

Theoretical Basis for the Study

This study was grounded in feminist theory, which provides the reader with the proper analytical tools to examine the institutional inequities female students face in school. Centering issues of sexist dress codes around feminist theories like Performance Theory, Intersectionality, and Panopticism informs the reader about the deep-rooted issues surrounding institutional socialization and how that trickles down to the creation and implementation of dress code policies. According to McCann and Kim (2010), "feminist theories apply their tools to building knowledge of women's oppression and, based on that knowledge, to developing strategies for resisting subordination and improving women's lives" (p. 1). Performance Theory, Intersectionality, and Panopticism are feminist theories that help the reader develop the proper tools to expand their knowledge base surrounding institutional sexism and inequities, while also developing ways to fight oppression and improve the lives of female students.

Performance Theory

Judith Butler theorizes that gender identity is a perfomative act (Reddy & Butler, 2004). According to Butler (1997), "the acts by which gender is constituted bear similarities to performative acts within theatrical contexts" (p. 420). Here, Butler is comparing gender expression to the performative acts on a theatrical stage. Gender is something you *do* and often can change from day to day – much like a costume change in the theater. Even though gender identities may be performed in slightly different ways, the same script is being followed (Butler, 1997). Gender is "a

constructed identity, a performative accomplishment which the mundane social audience, including the actors themselves, come to believe and to perform in the mode of belief" (Butler, 1997, p. 417). Performing one's gender, and performing it well, means that they have successfully achieved the illusion of gender. Both the actors and the audience participate in the performance—the gender constitution.

Gender is a verb, not a noun, and is performed through a "*stylized repetition of acts"* (Butler, 1997, p. 419). Gender is constituted by the way individuals stylize their bodies, including their physical appearance, gestures, and bodily movements. These unremarkable acts all come together to give the appearance of "an abiding gendered self" (Butler, 1997, p. 419). Butler (1997) uses Performance Theory to demonstrate the concept of gender as a social construct, which "moves beyond biology to consider social rules and cultural codes" (Ponte & Gillan, 2007, p. 346). The gendered body is made up of individualized acts similar to performative acts on a theatrical stage. One is not simply male or female, but must learn how to perform proscribed masculinities and femininities in order to fit into the gender binary of man or woman (Butler, 1997). The illusion of a gendered self "is a performative accomplishment compelled by social sanction and taboo" (Butler, 1997, p. 420).

The visual body that society has learned to associate with either male or female is nothing more than a performance. This performance includes gestures, mannerisms, clothing, and other bodily adornments, which work together to help one accomplish their assigned gender (Butler, 1997). According to Ponte and Gilligan (2007), "there are no biological or immutable traits that require women and men to dress or groom

[in] certain ways" (p. 348). Cultural control mechanisms such as dress are used as visual markers to ensure that one is performing their gender properly. These regulatory practices maintain the gender binary of males as men and females as women (Todd, 2007). Butler (1997) contends that it is through this strategic effort to keep gender within its "binary frame" that "render social laws explicit" (p. 425). Those social laws are maintained and enforced through social structures and institutions like education. Performance Theory is relevant to the study of dress codes because, like one's gender, clothing is socially constructed and part of the performance of a gender abiding student.

Intersectionality

When examining how gender is constituted, it is important to do so with an intersectional approach. The fluidity of gender is intersected by numerous other identities, such as race, class, and sexuality, "providing for a range of masculinities and femininities" (Raby, 2010, p. 336). Intersectionality, a term coined in 1989 by sociologist Kimberle Crenshaw, focuses on the intersection of multiple identities (Crenshaw, 1991). Crenshaw (1991) originally created the concept of intersectionality to explain "the various ways in which race and gender interact to shape the multiple dimensions of Black women's employment experiences" (p. 1244). A woman of color cannot be Black in one aspect of the social world and woman in another – she is both at the same time. When discourse responds to one or the other, Black women are further marginalized within society (Crenshaw, 1991).

Black feminist scholar Patricia Hill Collins (1990) states that viewing identities as separate emphasizes dichotomous thinking. Categorizing identities in this either/or fashion ranks those identities, which requires that one side of the dichotomy be valued while the other is oppressed. Collins (1990) argues that identities and systems of oppression should be viewed as an interlocking system. Instead of looking at similarities and differences with dichotomous categories, attention should be focused on how they interconnect – or intersect (Collins, 1990). When deconstructing how the social world is organized, intersectional identities need to be included in that process to ensure that all individuals' stories are given equal space.

The experiences of women cannot be generalized to the dominant norm – white women. Intersecting identities of gender, race, class, and sexuality need to be considered when studying systems of oppression (Collins, 1990; Crenshaw, 1991). Intersectionality is a necessary approach to this study because the researcher cannot make generalizations about the female gender without considering intersecting identities. For example, there are dress code rules that specifically target Black female students, such as the prohibition of African head wraps. When analyzing high school dress codes, an intersectional lens is needed in order to determine if female students of color are targeted differently than white female students.

Panopticism

Foucault's (2008) critique of power uses the Panopticon model to demonstrate how bodies are disciplined in institutions such as the military, prison, and school. The Panopticon is a model prison, designed by Jeremy Bentham in the 19th century, which

is a circular structure with a tower in the center and wide windows overlooking cells, each with two windows. One window faces the tower and the other faces the outside, which creates backlighting – making the figure within the cell always visible (Bartky, 1990). Foucault (2008) refers to these cells as small theaters, where each actor participates in their own individualized performance. According to Foucault (2008), "the major effect of the Panopticon [is] to induce in the inmate a state of conscious and permanent visibility that assures the automatic functioning of power" (p. 6).

Panopticism is necessary when examining discipline and sanctions within the educational system. If institutions such as education are set up to create a docile student body that conforms to the rules and expectations of the institution, that internalized discipline serves as a driving influencer for self and peer policing of appearance and dress code rules. Panoptic high school campuses produce female students that are constantly visible and yet required to cover themselves up (Foucault, 2008, p. 6). The constant visibility of the panoptic structure creates submissive bodies that follow the rules without having to be told. In the pursuit of productivity and docility, dress codes that serve as a disciplinary measure continually produce inequalities on a systematic level (Ryan, 1991).

Definition of Terms

Cultural Capital: According to McLaren (2009), cultural capital "refers to the general cultural background, knowledge, disposition, and skills that are passed on from one generation to another" (p. 80).

Double Standard: According to Martinez (1972), a double standard is "one standard of sexual behavior for women [and] a different standard for men" (p. 44).

Gender: Refers to the social and cultural classification between masculine and feminine (Delphy, 1993).

Gender Roles: Society's expectations of how females and males should behave (Schafer, 2010).

Hegemony: The process by which the dominant culture exercises control over subordinate groups. This control is maintained through consensual reinforcement of societal norms, which are defined by the dominant class (McLaren, 2009).

Panopticon: A model prison designed by Jeremy Bentham with a circular structure, a tower in the center, and wide windows overlooking cells, each with two windows. One window faces the tower and the other faces the outside, which creates backlighting – making the figure within the cell always visible (Bartky, 1990).

Patriarchy: The institutionalization of sexism (hooks, 2000).

Sex: Refers to the biological differences between female and male—genitalia and reproductive function (Delphy, 1993).

Title IX: According to Smith (2012), Title IX prohibits educational institutions receiving federal funds from discriminating on the basis of sex.

Organization of Thesis

This thesis is organized into five chapters, as required by California State University, Sacramento's Office of Graduate Studies. Chapter 1 introduces the topic of gendered dress codes in high school and explains why this thesis is relevant.

Chapter 2 consists of an extensive review of the literature, providing justification for this thesis. Chapter 3 includes the methodology section, which provides the reader with a deep understanding of the researcher's process of data collection and analysis. Chapter 4 presents the results and analysis of the data collected from high school dress codes policies. Chapter 5 is comprised of the discussion, conclusion, limitations, and recommendations of the study.

Background of the Researcher

Jaymie Arns is a part-time faculty member at California State University, Sacramento currently completing her Master of Arts in Education with an emphasis in Behavioral Science – Gender Equity. She received her Bachelor of Science in Women's Studies from CSU Sacramento as well and worked as a student assistant in the Women's Studies department through most of graduate school. Women's Studies courses at CSU Sacramento are highly interdisciplinary and intersectional, allowing Jaymie to develop critical thinking skills grounded in feminist theory. Furthering her academic career in the field of Education has allowed Jaymie to couple her passion for social justice and feminism with gender equity in education.

Chapter 2

LITERATURE REVIEW

Introduction

This thesis is an exploration of high school dress code policies through a feminist lens. Feminist theory provides the tools needed to understand how cultural and political systems are sanctioned through the performative acts of an individual, while also deconstructing such acts in a broader social context. The clothed body is constituted through social sanctions, often enforced through institutions such as education (Butler, 1997). The researcher surveyed five categories of literature in relation to dress: research on the social construction of gender, research on the historical significance of school dress codes, research on dress and gender norms, research on the rationales for dress code policies, and research on dress code sanctions. Because empirical data is limited on the topic of gendered dress codes, the researcher surveyed a number of legal notes and theory-based research along with the available empirical data to give the reader a comprehensive look at gender and dress code policies.

The Social Construction of Gender

Gender Socialization

A comprehensive look at socialization, seen as the "process through which a person consciously and unconsciously participates in a number of diverse and complex roles," is an important starting point in the examination of social construction (Zambrana, 1988, pp. 79-80). Socially constructed roles, like gender, are constituted

through the repetition of acts that make up social categories (Butler, 1997). Gender categories, according to Arnot (1982), are "arbitrary social constructs" that differ from the category of sex, which is based on biological differences between females and males (p. 33). Arnot (1982) argues that the two categories of gender and sex share a commonality, which is that they are set up in an either/or fashion. This dichotomous way of looking at sex and gender creates rigid categories of male/female and man/woman that work together to perpetuate the notion of innate differences (Arnot, 1982; Collins, 1990).

The social construction of gender is actively produced through "dress, behavior, attributed personality traits, [and] expected social roles" (Byrne, 1978, as cited in Arnot, 1982, p. 33). Thus, upholding gender categories is a complex externalized performance of an identity that is actively constituted throughout one's life (Arnot, 1982; Butler, 1997). According to Byrne (1978), "Gender is the collection of attitudes, which society stitches together to clothe boys and girls" (as cited in Arnot, 1982, p. 33). Society, then, is essentially clothing children with their gender, which must fit the dichotomous category of male or female. As with all dichotomous categories, one side of the dichotomy is valued (male) while the other is not (female), which creates and maintains a hierarchy of privilege and power (Collins, 1990). Essentialist arguments that state men and women are inherently different work to construct gender and perpetuate the hierarchal system, where men are ranked above women (Arnot, 1982).

Gender and Class

In order to fully comprehend the social category of gender, Arnot (1982) contends that the social category of class must also be examined. Because boys and girls have to consciously and unconsciously navigate through both gender identities and class identities at the same time, "the source and nature of the imposition of gender differences is so concealed that the power of the dominant class and the dominant sex is increased by such unconscious legitimation" (Arnot, 1982, p. 34). The perpetuation of dominant norms leads to the production of gender and class structures, which ensure that the reproduction of hegemonic values is accepted by all of those within the social hierarchy. Both oppressed and privileged members of society construct and maintain gender and class categories, which are built on middle-class male narratives, and work together to maintain male hegemony (Arnot, 1982).

Gender and Race

Arnot's (1982) argument on male hegemony and the construction of the social identities of gender and class omits a significant socially constructed category—race. Although gendered and classed identities are important to examine simultaneously, the primary focus on this relationship is problematic for those who do not fit into the dominant culture's white ideals. Despite the fact that class is a very important factor in the discourse surrounding social relations, race is paramount to the conversation (Dill, 1983). Therefore, discussions on hegemonic power structures and the social construction of identities need to be intersectional (Collins, 1990). According to Dill (1983), "we must examine on an analytical level the ways in which the structures of

class, race, and gender intersect in any woman's or group of women's lives in order to grasp the concrete set of social relations that influence their behavior" (p. 65). The same should be said of intersecting male identities.

School as Agent of Socialization

The social construction of gender, class, and race categories are maintained through institutions, like education, which perpetuate dominant norms of behavior. Not only do schools deliberately display the racism, classism, and sexism of the dominant culture, but they work as active agents of socialization (Zambrana, 1988). Students are expected to adopt the values and social roles assigned to their social category. For example, girls across all class and race categories are expected to be "quiet, docile, and diligent," which are the attributes assigned to the female gender (McKellar, 1989, p. 118). According to McKellar (1989), "the mere fact of being successful in school is indicative of being able to conform to the social controlling mechanisms" (p. 117). Therefore, those best served by the institution of education are those students who fit hegemonic ideals. The school's attempts to construct the identities of its students create a student body who are also active agents of socialization and "who unconsciously or consciously consent to the dominant version of gender relations" (Arnot, 1982, p. 36).

Examining the ways in which gender is socially constructed is essential to the examination of male hegemony. Taking a deeper look into the construction of identities such as gender leads to discussions of class and race, which are also socially constructed. Making the intersections of gender, class, and race visible changes the

narrative surrounding social categories and power by giving voice to those simultaneously oppressed. Institutions like school are agents of socialization that create a population of young people who actively and passively enter into social categories of gender and simultaneously ensure that those around them do so as well.

Historical Significance of School Dress Codes

In the late nineteenth and early twentieth centuries, the American public school was born. The institutionalization of education at that time focused on preparing students for their prescribed gender roles in society. With the inception of compulsory education came gendered dress codes, which "reflected the gendered separation of society at large" (Glickman, 2016, p. 267). Thenceforth, dress codes have been eagerly implemented with support from school officials, parents, and elected officials (Crockett & Wallendorf, 1998). The anti-war movement, civil rights movement, and second wave of the feminist movement in the 1960s all challenged the status quo. Consequently, school dress codes at that time enforced traditional images of masculinities and femininities. According to Smith (2012), "between 1968 and 1977 there were over 150 reported cases involving male student hair-length policies" (p. 253). Similarly, female students began to file suit for the right to wear pants (Smith, 2012).

1960s

As social unrest pervaded school campuses, the 1960s brought about the first considerable opposition to dress code policies. Despite the expanding support of students' civil rights, dress codes were still very much gendered (Glickman, 2016).

Proper performance of gender through dress was compulsory and permeated all aspects of society. For example, up until the year 1968 a man could be arrested for wearing clothing or accessories associated with the female gender in public (Whisner, 1982). In the 1968 court case, *Ferrell v. Dallas Independent School District*, the court held that male students be required to keep their hair short in order to avoid disruption at school (Smith, 2012). Therefore, schools wanted to keep visual distinctions between males and females as binary as possible.

The 1969 black armband case, *Tinker v. Des Moines Independent School District*, was a landmark case that defined a student's First Amendment rights pertaining to dress. Although unrelated to gendered dress rules, the court ruling established that students have a right to the freedom of speech or expression on school grounds (DeMitchell, Fossey, & Cobb, 2000; Smith, 2012). However, the Supreme Court determined that school was an exceptional place when applying First Amendment rights. Students were given rights to free speech and expression, but school officials were given a certain amount of leeway in applying those rights. Additionally, the Supreme Court in *Tinker* concluded that in order for an article of clothing to secure the protections of the First Amendment, it much be *speech*. That is, the clothing must refer to a social, political, or religious issue (DeMitchell et al., 2000). For this reason, cases involving gendered dress rules are not successfully argued under this ruling. However, a case could be made that the female body is in fact political and should be constitutionally protected.

1970s

While numerous hair length and hairstyle cases in the 1970s challenged the legality of gendered dress code rules, **"**these cases reflect the confrontation of two generations' differing notions of gender norms, rather than a challenge to the gendered nature of dress codes themselves" (Glickman, 2016, p. 265). However, cases that argued for a female student's right to wear pants did challenge the gendered nature of dress codes by demanding a paradigm shift in gender roles. The court's ruling in *Bannister v. Paradis* (1970) deemed that the school's prohibition of blue jeans for male students was unconstitutional. Yet, the court upheld the prohibition of pants for female students as constitutional. The reason being that scantily clad students would distract other students and be disruptive of school discipline and the educational process (Whisner, 1982). The fact that jeans worn on the male body was permissive, but jeans worn on the female body was disruptive demonstrates the gendered application of dress code policies.

A school that did allow female students to wear pants to school amended their dress code policy following *Wallace v. Ford* (1972) to include jeans. This ruling was qualified to include three rules: the jeans must be made for girls, if the jeans opened in the front, the opening must be covered by their blouse, and if the jeans opened on the side, girls could wear any length shirt (Whisner, 1982). The court in *Wallace* also set modesty rules for the tightness of girls' pants and the tightness and length of their skirt. Pants that were too tight and skirts that were too short and/or too tight were labeled "immodest" and "suggestive" (Whisner, 1982, p. 107). Whisner (1982) asserts

that "the issue as the *Wallace* court saw it involved not *whether* a female body clothed in a certain way connoted sex, but *which* manner of clothing was the trigger. It happened that the court drew the line at tight skirts and pants and short skirts" (p. 108). The subjectivity involved in labeling certain clothing articles as immodest and therefore sexual continues to prevail throughout history.

After a trial court upheld a school district in Idaho's dress code stating that girls wearing pants would attract excessive attention and therefore be a distraction for other students, the case was taken to the Idaho Supreme Court. In the 1973 case, *Johnson v. Joint School Dist. No. 60,* the court upheld the trial court's decision, stating that:

> 'The wearing of culottes, slacks or pantsuits by female students results in a detrimental effect on the morals of the students attending the school and upon the educational process; that wearing slacks and pantsuits results in unsafe conditions and safety hazards at the school; leads to insubordination, rebelliousness and lack of respect for authority; results in loss of respect for, and damage to, school property; results in a detrimental effect upon the general attitude of the students; results in an increased amount of physical contact and familiarity between boys and girls in school surroundings; results in loss of standards of conduct and has a detrimental effect on emotional makeup and problems in the school district.' (as cited in Whisner, 1982, p. 103)

From these cases, it is evident that the school and court efforts to keep girls in skirts that were not considered to be too short or too tight aided in the construction of

gender. A female student who wore pants was not performing her gender appropriately.

1980s

The late 1970s and early 1980s saw a relaxation in gendered dress code policies, with more schools allowing female students to wear pants and male students more freedom in their grooming procedures. This relaxation was short lived, however, as the political climate of the 1980s shifted to more conservative values. Not only did a number of states adopt laws that gave school districts and principals more power in implementing restrictive dress code policies, but dress codes were seen as a way to improve academic success and put a stop to violence (Glickman, 2016). Additionally, the Reagan Administrations stripped Title IX of protections "prohibiting 'discriminat[ion] against any person in the application of any rules of appearance' on the basis of sex" (Smith, 2012, p. 254). Once a very powerful weapon against gender restrictive school dress code policies, Title IX could no longer protect students from discriminatory appearance policies (Smith, 2012).

A number of court cases from the late 1980s further defined and strengthened the school districts' role in dress code policies. In the 1986 case, *Bethel School District No. 403 v. Fraser*, the court ruled that school officials were responsible for disciplining a student for using certain speech at school assemblies – and for determining what speech was inappropriate. This case strengthened the notion that the constitutional rights of public school students were not the same as the rights of adults in other public settings, thus furthering support for school dress code policies

(DeMitchell et al., 2000). Put another way, this lawsuit established that public schools were non-public settings, which allowed for tighter control over student behavior and appearance policies (Freeburg, Workman, & Lentz-Hees, 2004).

The following year in 1987, a female student and a male student in Ohio sued the school district for not allowing them to attend their prom in clothing traditionally worn by the opposite gender. In *Harper v. Edgewood,* the federal court found that the school's decision did not violate the students' First Amendment rights (DeMitchell et al., 2000). The court concluded that schools have the authority to implement and enforce dress code rules that teach "community values" and promote "school discipline" (Smith, 2012, p. 256). It is clear from the ruling that the school in question and the Ohio court viewed cross-dressing as promoting insubordination and going against dominant societal norms. A girl in a suit or a boy in a dress demonstrated the students' lack of internal discipline in their performance of gender.

That same year, an Illinois student challenged a school rule that did not allow male students to wear earrings. The school's rationale for the rule was to control gang activity, but the student argued that it infringed upon his First Amendment right to free expression. In *Olesen v. Board of Education*, the plaintiff lost his case, much like the Ohio cross dressers (DeMitchell et al., 2000). The court supported the school's "anti-gang dress policy that prohibited male students but not female students from wearing earrings. The court held that this restriction was rational and did not unconstitutionally curtail a student's freedom to choose his own appearance" (Smith, 2012, p. 255). According to the court, the student did not demonstrate that his

intention of wearing an earring was to communicate a particularized message and that his individuality was not protected under the First Amendment (Smith, 2012). The courts determined, then, that the presentation of a particularized message and the expression of individuality were mutually exclusive.

1990s

In the 1990s, restrictions on student dress and appearance continued to grow and strengthen. At this time, public schools "experienced a resurgence in dress codes, ranging from prohibitions against certain articles of clothing to mandated uniforms" (Crockett & Wallendorf, 1998, p. 115). Between 1992 and 1996 alone, 12 states passed laws giving school districts the authority to enforce dress codes and uniform policies for students. Of those 12 states was California, which stated that dress codes would improve the safety, security, and behavior of students and help solve the problem of increased weapons and violence in schools (DeMitchell et al., 2000). These state reforms garnered national attention and peaked in 1996 when President Clinton "explicitly endorsed school uniforms as a solution to school violence and improved education outcomes" during his State of the Union Address (Glickman, 2016, p. 268). Numerous municipalities answered the President's call by implementing strict uniform and dress code polices (Glickman, 2016).

In 1995, a male student claimed that the First Amendment gave him a constitutional right to wear sagging pants to school. The judge in *Bivens by Green v. Albuquerque Public Schools* upheld the school district's dress code rules, asserting that sagging pants was an act of defiance not constitutionally protected under the First

Amendment (DeMitchell et al., 2000). Sagging pants were associated with gang violence and seen as a problem dress codes and uniforms could fix. A content analysis of newspaper and magazine articles found that school violence was a well-established, not a new, problem. The only thing that had changed was the language used to describe incidents of violence. According to Crockett and Wallendorf (1998), "a historically recent change in language is that violence perpetrated by groups of Anglo students is virtually never referred to as gang related in press accounts" (p. 117). Rather, violent white male students are frequently perceived as perpetrators of bullying. Similarly, hairstyles popular among Black students were banned in a Chicago area school in 1996 because school officials said they represented gang membership (Crockett & Wallendorf, 1998).

Since the 1990s, school dress codes continue to have gendered and racial applications of the rules. Because a student's constitutional right to free speech and expression are protected under the First Amendment, as well as their right to equal protection under the Fourteenth Amendment, dress code policies that control students' self-expression and perpetuate gendered stereotypes have historically been an item of contention in the courts (DeMitchell et al., 2000; Smith, 2012). For the gender-specific problems that arise from dress code policies, the Equal Protection Clause of the Fourteenth Amendment is the most effective tool used in court cases. However, the courts have accepted the prevention of distraction, enforcement of school discipline, and teaching of community standards as justifiable objectives of school dress codes—all of which have gendered connotations (Smith, 2012).

Dress and Gender Norms

School, an active agent of socialization, is a gendered institution that is representative of the dominant culture's prescriptions of masculinities and femininities (Messner, 2009). The function of school is twofold: to educate children on the essentials of the academic world, and to teach children social rules and dominant norms (Glickman, 2016). These dominant norms are perpetuated throughout the institution and "instruct children how to speak, what to wear, how to move their bodies, and, ultimately, how to inhabit different race, class, and gender positions" (Morris, 2005, p. 44). Children are learning how to abide by gender rules, made explicit through school policies centered around a student's appearance and clothing. The socially defined meaning of clothing moves beyond protecting the body from the elements and demonstrates that clothing serves as a representative of a society's culture, and the campus culture at school (Kaveh, Moradi, Hesampour, & Zadeh 2015).

In order to perform culturally defined gender roles, one must follow society's definitions of dress for men and women. These gender differences in dress, used to construct and reproduce gender roles, have been historically and cross-culturally prevalent (Paff & Lakner, 1997). Taylor's (1970) historical analysis of gender roles found a correlation between gender roles and dress. Times in history when men and women have performed similar roles show that they also had similar dress. On the other hand, the dress of men and women has differed the most when gender roles and expectations have diverged (Taylor, 1970). It is no wonder then that schools and

educational bureaucracies have concerned themselves with how their students present themselves through dress (Meadmore & Symes, 1997). Current popular discourse on the need for school dress codes indicates concern over girls' revealing clothing, their sexuality, and therefore the performance of their gender roles. Female sexuality is socially constructed through social rules like dress code policies (Raby, 2004).

The dominant norm of society is a white, heterosexual, cisgender, middle-class male. Dress codes are devised to perpetuate the white male as the dominant norm and therefore reflect what fits this group best. Dress codes are not created to challenge the status quo, but to preserve the socially constructed gender roles of men and women (Glickman, 2016). Dress codes affect the construction of gender by either distinguishing between genders or repressing the expression of genders (Crockett & Wallendorf, 1998). In this way, standards of dress adhere to the gender binary by relating dress to notions of behavior – girls should be lady-like and boys should be manly. This reproduction of gender paradigms perpetuates the notions of inherent differences between men and women and inherent differences between certain clothing items (Glickman, 2016). However, because "dress codes and gender are both social constructions" (Glickman, 2016, p. 274), there is nothing intrinsically sexual about certain items of clothing worn on certain bodies.

On school campuses, dress codes are a mechanism of control that students must conform to or face the consequences (Glickman, 2016). A 2010 qualitative study, which concentrated on how high school girls' negotiate their dress code policies, found that female students "both contest and reproduce institutional and peer

regulation of girls' dress" (Raby, 2010, p. 334). Raby (2010) argues that the focus-group conversations between students demonstrate how high school girls actively construct gender through either their condemnation or embracement of bodily displays of the clothed body. Therefore, female students not only face the risk of discipline from school officials for nonconformity to dress code policies, but they also risk punishment from their female peers (Raby, 2010).

Peers are also agents of socialization who take an active role in the policing of student bodies, enforcing social norms and values through praise or admonishment (Grosz, 1990). Female students negotiate the discourses surrounding appearance rules as active, social agents in the social construction of gender. Girls can simultaneously "invest in, play with, and critique dominant representations of femininity" expressed through dress (Raby, 2010, p. 337). School dress codes define what is acceptable for female dress and sexuality by normalizing certain expressions of femininity and problematizing others (Raby, 2010). The female body is deemed inherently sexual and is therefore in need of covering, placing the burden on young girls to control the climate of the school through her dress (Glickman, 2016; Raby, 2010). While "policies pertaining to school clothing can appear to be" trivial, "they are significant nonetheless and warrant examination" (Meadmore & Symes, 1997, p. 174)

Rationale for Dress Code Policies

School principals are at the heart of the debate surrounding dress code policies, as they are charged with authoring and implementing the rules and rationales (DeMitchell et al., 2000). DeMitchell et al. (2000) found in their qualitative study of

school principals' perceptions of dress codes that school principals were supportive of dress code policies. High school principals in particular were most supportive of dress code policies when compared to elementary school and middle school principals, but showed little to no support for uniforms. When asked to explain their stance on dress codes in their own words, 94% of high school principals stated that they were necessary because they set certain standards, reduce learning distractions, and reflect life outside of school (DeMitchell et al., 2000). In order to satisfy the Equal Protection Clause, principals must demonstrate a "legitimate and important" rationale for gender-based dress code rules (Smith, 2012, p. 255).

Dress code rationales, a statement of justification or grounds for the regulation, should strike a balance between constitutional requirements, institutional safety, and the individual expressions of the students (Freeburg et al., 2004; Glickman, 2016). Instead, schools see dress code rationales as a way for school districts to reduce lawsuits. Therefore, legitimate, clear, and unambiguous rationales are needed. The courts have established the following acceptable rationales: increasing academic success, avoiding gang activity and violence, ensuring a learning environment free of disruptions, and ensuring a safe and secure learning environment (Freeburg et al., 2004). A survey of the literature on dress code rationales found multiple interpretations of these acceptable rationales.

A study performed in the late 1990s focused on the rationales given in public discourse surrounding school dress codes rather than on the specific dress codes themselves. Crockett and Wallendorf (1998) examined "public claims made in mass-

media articles covering dress code implementation in a wide variety of U.S. school districts as evidence about the concerns and rationales employed in public debates over whether to implement this form of consumption restriction in schools" (Crockett & Wallendorf, 1998, p. 116). The data presented three primary rationales for public support of dress code implementation: "prevention of gang-related violence, prevention of competitive dressing and clothing theft, and the imposition of discipline" (Crockett & Wallendorf, 1998, p. 117). However, the rationales given in public discourse are not fully in line with the court's acceptable rationales, other than the prevention of gang violence.

A number of other studies have examined actual student handbooks to determine schools' rationales for implementing or revising school dress code policies. A 2004 qualitative content analysis examined 150 student handbooks and their rationales for dress codes. The findings indicate that of those 150 handbooks, 78% related dress code rules to students' right to a non-disruptive learning environment. Seventy-one percent of the handbooks related dress code rules to students' rights to a safe and healthy learning environment. Additionally, 63% of the handbooks related dress code rules to both rationales (Freeburg et al., 2004). The rationales found in Freeburg et al.'s (2004) study are in line with the accepted rationales outlined by the courts.

A 2006 qualitative content analysis of eighty student handbooks found that 84% of dress code policies related safety and security as the rationale for the implementation of dress code rules. Additionally, 14% listed dressing appropriately

for an educational environment, and 2% had no rationale (Workman & Freeburg, 2006). Workman and Freeburg (2006) also noted that the dress code rules related to safety were proscriptive, detailing unacceptable items of clothing, rather than prescriptive, which would have provided guidance for what was acceptable to wear in the school setting. Again, the rationales found in Workman and Freeburg's (2006) analysis corroborate the law.

A 2007 qualitative content analysis examined 104 newspaper articles to investigate rationales given for dress code revisions. Studak and Workman (2007) found seven basic reasons for dress code revisions: a safe and secure school climate, intolerance for violence or bullying, tolerance for diversity, connectedness to school, identifying student behavior that could be a result of loneliness, identifying student behavior that could be the result of victimization, and identifying student behavior that could be the result of alienation. All of these rationales for revisions to dress codes had the unstated goal of prompting respect for others and civil behavior. The researchers coded "current fashion trends," which accounted for 30% of the reasons found, under "safe and secure school climate." This category had gendered connotations, with "suggestive dress" and "too much skin" being included here (Studak & Workman, 2007, p. 26).

In Glickman's (2016) legal analysis of gender restrictive dress code policies, three rationales were found: gang prevention and violence reduction, disciplined learning environment, and professionalism. Because gangs use an exhaustive variety of dress and appearance markers, including sports teams, specific colors, and

bandanas, dress code rules that aim to reduce gang activity can be stringent. However, this strategy does not address the underlying problems that may lead to gang involvement in the first place (Glickman, 2016). In her analysis, Glickman (2016) includes non-disruption related rationales in the "disciplined learning environment" category (p. 270). According to Glickman (2016), "dress codes are seen as the solution to…disruptions because they remove the stimulus that causes the disruption; however, what is considered disruptive can be quite subjective" (Glickman, 2016, p. 271). Professionalism rationales are problematic because the ideal professional is often a white cis-gender male. Marginalized students are unable to easily conform to this standard, which leads to disproportionate disciplinary measures against female students, non-binary students, and male students of color (Glickman, 2016).

As Glickman (2016) asserts in her analysis of gender restrictive dress code policies, even when rules disproportionately target marginalized students such as girls, they are acceptable as long as the rationales are clear and in line with the court's approved regulations. As Crocket and Wallendorf's (1998) findings reveal,

> Whether unisex or gendered, acceptable dress for young women under the rubric for dress codes masks the display of female sexuality. Dress codes ensure either that female students will wear pants and shirts that masculinize their developing bodies, as is true in unisex dress codes, or that they will wear modest feminine attire, as specified in traditional dress codes. (p. 124)

Schools treat the female body as a symptom of the problem, demonstrating that girls are responsible for their school climate. As long as schools relate gender restrictive rules to approved rationales, there is no constitutional recourse for students.

Dress Code Sanctions

Much like the implementation of dress code rules and their associated rationales, "courts usually grant school officials a large amount of discretion in handling disciplinary problems at their schools" (Simson, 2014, p. 510). Even for seemingly minor offenses, out-of-school suspensions are the most widely used disciplinary tool for controlling student behavior. The loss of instructional time associated with out-of-school suspensions is "an important predictor of achievement outcomes" (Simson, 2014, p. 516). In fact, any time instructional time is lost, the academic development of students is hampered, diminishing their probability of success. Empirical data collected over the last three decades have continually found that school disciplinary actions disproportionately affect students who are already marginalized, such as girls and students of color (Simson, 2014). According to McKellar (1989), "the mere fact of being successful in school is indicative of being able to conform to the social controlling mechanisms" (p. 117), and minority students are less likely to be able to adhere to rules set up to perpetuate the dominant norm.

Dress code violations are violations of the school dress code policies as described in the school handbook. School handbooks also describe the disciplinary consequences, or sanctions, attached to dress code violations (Workman et al., 2004). When a student violates the dress code rules, school officials "can impose a variety of

disciplinary mechanisms including suspension or expulsion" (Glickman, 2016, p. 279). These sanctions and the constant threat of disciplinary action are assumed to provide motivation to students, forcing them to conform to the control mechanisms (Workman et al., 2004). Thus, dress code sanctions ensure the function of power within the school, much like Foucault's (2008) Panopticon.

A 2004 qualitative content analysis identified and evaluated the sanctions attached to dress code violations in high school handbooks. Twenty-six sanctions were identified in the analysis of 155 public high schools' handbooks. The researchers coded those sanctions into seven categories: source, formality, retribution, obtrusiveness, magnitude, severity, and pervasiveness (Workman et al., 2004). The researchers found that all 26 sanctions were coded as being formal in nature, originating from an external source (such as a school official), and represented various forms of discipline and punishment. Twenty-two sanctions were coded are moderate in severity, 21 sanctions were considered obtrusive, 16 were considered mild in magnitude, 13 were classified as pervasive, and 13 were classified as non-pervasive (Workman et al., 2004). This study provides a baseline for understanding the subjectivity involved with disciplining a student for dress code violations.

A 2010 qualitative study, which conducted focus group interviews of high school students, focused on "the female participants' negotiation of dress codes, for within such commentaries these young women both contest and reproduce institutional and peer regulation of girls' dress" (Raby, 2010, p. 334). Overall, the participants felt as though dress code rules were not applied consistently, subject to

school officials' personal interpretation of appropriate dress, and that they were over-policed. Some participants also stated that the dress code rules unfairly target girls with rules against immodest clothes and their subjective enforcement. Although female students expressed opposition to their school's dress code policy, they also demonstrated internalized discipline and peer control in their comments about other girls (Raby, 2010). In five of the eight focus groups, certain clothing items were described as "whorish, slutty, disgusting, disturbing, and wrong" and attributed to girls trying to attract boyfriends or attain popularity (Raby, 2010, p. 345).

Girls' peer regulation of appearance was most apparent in their use of such derogatory terms as slut and whore. According to Raby (2010), "such regulation reproduces gender inequalities by narrowing ideas of acceptable female sexuality and policing anything considered excess" (p. 347). The findings indicate that there is a very fine line girls are required to negotiate between what is attractive and acceptable and what is slutty. While being attractive can bring a girl popularity, being considered overly sexual or "whorish" can bring exclusion and hostility. Not only were all female participants acutely aware of their dress code policy, many of the participants were in favor of dress code policies that would control sexual or peer harassment (Raby, 2010). As the focus-group participants discussed other female students in negative terms like slut or whore, they also recognized that they needed dress codes to help prevent such behavior. The participants both challenged and reproduced patriarchal controlling mechanisms surrounding appearance and dress.

Gender, Race, and Punishment

For Black female students, the disproportionate and subjective nature of dress code policies has a unique effect on their schooling. A 2017 analysis of the Kentucky School Discipline Study found that although "9 percent of students receive referrals for minor rule violations such as disruptive behavior, dress code violations, and cell phone misuse" (Morris & Perry, 2017, pp. 133-134), Black girls are more than three times likely to be disciplined for a minor offence compared to being white. Morris and Perry (2017) found that Black girls were disciplined for "offenses that [were] more subjective and [were] inconsistent with traditional norms of femininity. Specifically, black girls are likely to be disproportionately cited for disruptive behavior, disobedience, aggression, and other minor offenses, including dress code violations, in middle and high school" (p. 143). Morris and Perry's (2017) quantitative findings corroborate Morris' 2005 qualitative findings.

Morris' (2005) ethnographic study of an urban middle school's implementation of school uniforms demonstrates how disciplinary action differed according to school officials' perceptions of gendered and racial identities. Like other schools with restrictive dress codes, the administrators and teachers at Matthews Middle School linked school uniforms with student discipline and order (Morris, 2005). Morris' (2005) findings "emphasize how important teachers considered the visibility of student compliance with clothing rules" (p. 42) and echo Foucault's (2008) assertion that a visible body is a docile body. However, when a student was perceived as being disobedient, the school officials used the dress code rules to regain control. One of the

participants in Morris' (2005) study, a white female teacher, stated that dress codes were "'an easy way for teachers to assert their authority over the kids and make it look like they have control'" (p. 42).

Morris (2005) observed unequal enforcement of the dress code policies during his time at Matthews. On a number of occasions, Morris (2005) witnessed Black female teachers critiquing Black female students for wearing "hoochie-mama" clothing (p. 32). These school officials "appeared to identify the styles of black girls in particular as overly sexual and sought to reform them" (Morris, 2005, p. 33). Rolon-Dow (2004) observed the same phenomena in her ethnographic study of Puerto Rican middle school girls. According to Rolon-Dow (2004), "One of the dominant, controlling images teachers used to describe Puerto Rican girls was that of a hypersexual girl" (p. 13). This perceived hypersexuality was based on the appearance of Puerto Rican girls, including their make-up and dress. Similarly, Morris (2005) observed teachers and administration of various race and gender backgrounds used the phrase "Act like a young lady" to instruct Black girls in how to dress, speak, and sit (p. 34). Matthews had a small minority of Asian and white students who were almost never disciplined for their appearance or mannerisms, even when there were dress code violations (Morris, 2005). Morris' 2005 study, Morris and Perry's 2017 study, and Rolon-Dow's 2004 study demonstrate, through an intersectional lens, how girls of color are disproportionately targeted for dress code violations.

The tendency for school staff to punish Black and Latinx students more harshly than white students for the same or similar offenses demonstrates "that

educators interpret transgressions more critically when they are exhibited by children of color" (Morris & Perry, 2017, p. 129). For boys of color, especially, the intersections of gender, race, and dress signals to teachers and school administrators "the difference between a potentially dangerous student and a harmless one" (Morris, 2005, p. 37). In other words, it is not the clothing that is labeled as dangerous, but the student who is wearing the clothes. Morris (2005) found that Black and Latino boys at Matthews Middle School were seen as threatening, dangerous, and hyper-masculine, which lead to school staff subjecting them to "constant surveillance and bodily discipline" (Morris, 2005, p. 36). Moreover, students who were suspected of gang activity by staff at Matthews were typically Latinos, and this assumption was based on their clothing. Even when gang markers were not openly displayed, Black and Latino boys were still seen as having latent involvement in gangs and violent behavior (Morris, 2005). Further demonstrating teachers' implicit bias towards Black and Latino boys, Morris (2005) found that even when Asian boys and Latinas were involved in gangs, teachers "did not generalize that these groups of students, defined by race and gender, were dangerous" (p. 37).

Summary

The presentation of self is one of the ways that people distinguish themselves in the world—it is also one of the ways that they perform their gender. Self-expression is particularly important to young people, who have very few outlets to truly express themselves through their appearance and dress. Dress gives young people a sense of individuality and identity; unfortunately, expressing oneself through

dress is often at odds with school dress code policies that aim to control what students can and cannot wear to school (Smith, 2012). The rationales given for most school dress codes are student safety and the right to a distraction-free learning environment. While these objectives are reasonable, "there is a fine line between preventing distractions and infringing upon constitutional rights" (Smith, 2012, p. 252). If what constitutes a distraction happens to be a one's gendered and/or racial identities, the disproportionate application of dress and appearance policies are unconstitutional. Although discussions of dress codes are typically seen as innately petty, the contestation to such policies throughout history proves otherwise (Whisner, 1982).

Chapter 3

METHODOLOGY

Introduction

In order to obtain a substantial amount of data for the study, the researcher chose a qualitative content analysis of high school dress codes, without human subjects or testing. The researcher was primarily interested in the rhetoric used in high school student handbooks surrounding dress code policies and sanctions. Because of this, the handbooks themselves served as the data for this study. The purpose of this work was to provide a comprehensive look into dress code policies to determine if said policies perpetuate gender inequality in education. The study analyzed the rationales given for having dress code policies, the sanctions attached to dress code violations, along with the dress code policies themselves. The use of qualitative content analysis provided the researcher with new insights surrounding dress code policies and increased their understanding of the policies in the greater social context (Krippendorff, 2013).

Study Design and Data Collection

In qualitative research, the data should be analyzed to formulate answers to the research questions. The process of answering the research questions in a qualitative study requires the researcher to perform a thematic analysis. A thematic analysis allows the researcher to develop categories or themes from the qualitative data (Creswell, 2015). According to Creswell (2015), "Describing and developing themes from data consists of answering the major research questions and forming an in-depth

understanding of the central phenomenon through description and thematic development" (p. 246). For this reason, content analysis methodologies were employed to examine 56 high school handbooks and determine what the rationales for dress code policies were, what the sanctions attached to dress code violations were, and how many of the dress code rules targeted marginalized students. According to Babbie (1998), content analysis is "the analysis of communications" where "researchers examine a class of social artifacts, typically written documents" (p. 308). Not only does the concreteness of the student handbooks strengthen the reliability of this study (Babbie, 1998), but because of the specialized procedures involved in the data collection and analysis, content analysis "is learnable and divorceable from the personal authority of the researcher" and therefore a "scientific tool" (Krippendorff, 2013, p. 24).

This study consisted of qualitative data from content analysis of 56 California high schools' 2016/2017 student handbooks. The investigator gathered handbooks that were publicly accessible via the Internet through a Google search using the keywords "high school," "student handbook," and "California," which yielded 2,060,000 pages of results. Criteria for the selection process were that the handbooks be from the 2016/2017 school-year, that they were from public schools, and that the dress code policies did not employ a uniform policy. The first 75 California high school handbooks to meet this criterion were selected. The handbooks were then checked to verify that they had a stated rationale, sanctions listed for dress code violations, and specific dress code rules. Nineteen of the 75 handbooks were

eliminated because one or more of these sections were missing, leaving the researcher with a final count of 56 handbooks for analysis. In order to give the researcher a hands-on feel, the student handbooks were printed and alphabetized by school name.

Table 1

High School Handbooks Included in Study

Name of High School	Location of High School	Total Enrollment
1). Anaheim High School	Anaheim, California	3,206
2). Ann Sobrato High School	Morgan Hill, California	1,451
3). Bonita High School	La Verne, California	1,968
4). Buchanan High School	Clovis, California	2,601
5). California High School	San Ramon, California	2,639
6). Castro Valley High School	Castro Valley, California	2,977
7). Central Valley High School	Ceres, California	1,684
8). Chaparral High School	Temecula, California	3,237
9). Chico High School	Chico, California	1,769
10). Clayton Valley Charter High School	Concord, California	1,973
11). Cordova High School	Rancho Cordova, California	1,731
12). Coronado High School	Coronado, California	1,193
13). East Nicolaus High School	Nicolaus, California	301
14). Exeter Union High School	Exeter, California	962
15). Galt High School	Galt, California	936
16). Gridley High School	Gridley, California	622
17). Harbor High School	Santa, Cruz, California	1,032
18). Hart High School	Santa Clarita, California	2,326
19). Hemet High School	Hemet, California	2,334
20). Herbert Hoover High School	Glendale, California	1,719
21). Hesperia High School	Hesperia, California	2,052
22). High Tech High	San Diego, California	589
23). Hiram W. Johnson High School	Sacramento, California	1,449
24). Inglewood High School	Inglewood, California	1,207
25). Kingsburg High School	Kingsburg, California	1,131
26). Laguna Beach High School	Laguna Beach, California	1,038
27). Lawndale High School	Lawndale, California	2,241

28). Leuzinger High School	Lawndale, California	1,804
29). Lincoln High School	Stockton, California	2,925
30). Menlo-Atherton High School	Atherton, California	2,158
31). Milpitas High School	Milpitas, California	3,105
32). Mira Costa High School	Manhattan Beach, California	2,517
33). Miramonte High School	Orinda, California	1,155
34). Mission Viejo High School	Mission Viejo, California	2,438
35). Mountain House High School	Mountain House, California	482
36). Natomas High School	Sacramento, California	995
37). Norwalk High School	Norwalk, California	1,989
38). Oak Grove High School	San Jose, California	1,903
39). Orestimba High School	Newman, California	777
40). Palo Alto High School	Palo Alto, California	1,943
41). Piedmont High School	Piedmont, California	784
42). Placer High School	Auburn, California	1,386
43). Reedley High School	Reedley, California	1,817
44). San Dimas High School	San Dimas, California	1,363
45). San Juan Hills High School	San Juan Capistrano, California	2,391
46). Sanger High School	Sanger, California	2,734
47). Selma High School	Selma, California	1,719
48). Temescal Canyon High School	Lake Elsinore, California	2,172
49). Trabuco Hills High School	Mission Viejo, California	2,960
50). Tracy High School	Tracy, California	2,094
51). Valley Center High School	Valley Center, California	1,154
52). Walnut High School	Walnut, California	2,754
53). Westlake High School	Westlake Village, California	2,389
54). Woodside High School	Woodside, California	1,815
55). Yorba Linda High School	Yorba Linda, California	1,768
56). Yosemite High School	Oakhurst, California	656

Research Questions

Because dress is used as a primary agent of gender role socialization and also serves as a tool in the reproduction of gender, dress codes perpetuate the role of women and girls in society as sexual objects (Paff & Lakner, 1997). High school students potentially face the inequities written in their high school dress code policies,

but also the disproportionate enforcement of those rules among male and female students. For this reason, the researcher will answer the following research questions: What are the rationales given to substantiate high school dress code policies? What are the sanctions connected to dress code violations? How many dress code rules target students based on their gender, race, and/or class?

Research Instruments

The data gathering instrument used was a recording sheet, which consisted of three sections: (a) rationales for dress code policies, (b) sanctions attached to dress code policies, and (c) dress code rules. No participants were included in this research, however, the student handbooks themselves served as the data in this study, with the emphasis being on the written text in high school dress code policies. The starting point of the researcher's analysis, text, was "quite unlike physical events in that they are meaningful to others, not just the analyst" (Krippendorff, 2013, p. 27). The researcher's aim was to deconstruct the language used in high school student handbooks as they pertain to dress code policies.

Setting

The student handbooks were collected and analyzed via computer at the California State University Sacramento library and the researcher's home office. Both locations were accessible to materials and tools required to collect and analyze the data: computer, Internet, printer, paper, and ample workspace.

Procedures

Qualitative procedures for analyzing data included a thematic analysis of high school dress codes using interrelating themes. Since the rules, rationales and sanctions are all interconnected, this was the most effective method of analysis (Creswell, 2015). Because content analysis is, in essence, a "coding operation," the data was analyzed by coding both the manifest content and the latent content (Babbie, 1998, p. 313). Manifest content is defined as "the visible, surface content" (Babbie, 1998, p. 313). In order to determine the rationales for dress code policies and their connected sanctions, the researcher coded the manifest content by counting the number of times certain words or themes appeared. The researcher also coded the latent content, which Babbie (1998) defines as "its underlying meaning" (p. 313). This method of analysis was utilized when coding the specific dress code rules. Because the rules are formatted in a way that appears to be gender neutral, the researcher needed to examine and code the concealed content. In this way, the reading and coding of texts resonated with the analyst's background in gender equity (Krippendorff, 2013).

The content analysis of the high school handbooks began by separating the dress code rationale, dress code sanctions, and dress code rules from the handbook. Each of these sections was analyzed separately from one another, with distinct coding processes. In order to get a broad awareness of the data, a preliminary exploratory analysis was performed (Creswell, 2015). The rationale sections of the dress code policies were analyzed to determine the reason for the set of dress code rules. The sanction sections of the dress code policies were analyzed to determine the

punishment attached to offenses of dress code violation. Lastly, the dress code rules themselves, the items of clothing and grooming practices the school has listed as prohibited, were analyzed to determine the amount of rules targeting students based on their gender, race, and/or class. The data from each section had a unique coding procedure.

Dress Code Rationale

In order to determine the dress code rationales of the 56 California high schools, the researcher explored the data through coding (Creswell, 2015). Fifty-six codes were identified, which were then collapsed into six themes: *Set Certain Standards, Enhance Classroom Decorum, Increase Academic Success, Distraction-Free Learning Environment, Safe and Secure Learning Environment,* and *Reflect Life Outside School*. A table was then developed to tally which schools listed each theme in their rationale for their dress code policy, with a column for the schools and a column for each theme.

Dress Code Sanctions

In order to determine the sanctions attached to dress code violations, the researcher once again explored the data through coding (Creswell, 2015). Seven different sanctions were identified within the 56 student handbooks being analyzed. The first was to change the garment in violation of the dress code (either by using a school loaner, a parent delivery, or the child going home to change). The second was detention, followed by Saturday School, campus community service, suspension, undefined possible consequences, and lastly, transfer/expulsion. A table was then

developed to tally the occurrence of each sanction for each of the 56 high schools, with a column for the schools and a column for each sanction.

Dress Code Rules

In order to determine how many of the dress code rules were targeted towards marginalized student demographics, the researcher analyzed 56 high school dress code rules, specifically looking at the prohibited items and/or grooming practices. First, because the restricted items or grooming practices were often grouped together in sentences, the researcher separated the restricted items and composed a list of prohibited clothing items, accessories, and grooming practices. For example, Anaheim High School's first rule was stated as such: "Tube tops, spaghetti, and string straps, and clothes that expose the mid-section when standing, sitting or reaching or shorts or skirts that expose the buttocks" (p. 6). This line was broken down to reflect each clothing item separately: tube tops, spaghetti/string straps, clothes that expose the midsection, shorts that expose the buttocks, and skirts that expose the buttocks. This coding process was completed with all 56 dress code policies, identifying 288 prohibited clothing items, accessories, and grooming practices.

Once the 288 prohibited items were identified, they were categorized by item type: accessories, belts, body parts, clothing (general), color, dresses, footwear, grooming, headwear, leggings, pants, shorts, skirts, symbols, tops, and undergarments, with the item type entered at the beginning of the item (i.e. *Accessories—sunglasses* or *Body parts—midsection/midriff*). Categorizing the prohibited items in this manner made tallying the prohibitive rules more manageable, as the rules were alphabetized

by category. Each section of the dress code policies' rules was then explored and the prevalence of each item was recorded on a tally sheet. Once this extensive analysis was complete, the 288 rules were explored and coded as targeting female students, male students, or gender-neutral.

Most of the rules were presented in a gender-neutral manner, without stating which genders could not wear which items or groom in certain ways. For example, Oak Grove High School cited "clothes that expose the body in a sexually suggestive manner" (p. 31) as not acceptable. This was coded as *Clothing—sexually suggestive* and included in the *Rules Targeting Female Students* table. However, some of the high schools did list gender-specific rules. For example, Gridley High School stated that "young women are not permitted to wear bra less outfits, tube tops, strapless garments, H-straps, open back, open side, and/or spaghetti strap tops and very low cut shirts. Young men must wear shirts at all times unless prior administrative approval has been given" ("Dress Code Items Not Allowed, para. 1). These rules were coded accordingly.

Summary

A qualitative content analysis of 56 2016/2017 California public high school student handbooks was performed. The researcher examined the portions that have to do with the school's dress code policies. Specifically, the researcher analyzed the rationales given for the implementation of dress code policies, the sanctions attached to dress code violations, and the specific dress code rules. The data was collected though a Google search via the Internet. A random sampling was taken of publicly

accessible California high school handbooks and a thematic analysis of the content was performed. The data was analyzed by hand in order to give the researcher a "hands-on feel…without the intrusion of a machine" (Creswell, 2015, p. 239).

In order to check the findings and provide validity, reliability, and trustworthiness, the researcher complied random samplings of their coding processes and had them checked by an educator employed in the California State University, Sacramento's College of Education. This process accounted for bias and ensured the validity of the coding procedures. Additionally, the study appealed to social validity in order to prove that the findings were truthful. Because this study addressed an important social concern, and therefore added to the public discussion of dress code policies, this study was socially validated (Krippendorff, 2013). Both antagonists and proponents of high school dress codes can validate this research, which examines a public issue, because they are concerned about these issues and are committed to finding a solution to gender restrictive dress codes by translating these research findings into action (Krippendorff, 2013).

Chapter 4

FINDINGS

Qualitative Analysis

The goal of this study was to analyze dress code policies within California high school handbooks as they pertain to gender disparities. The researcher collected 56 handbooks, separating the rationales, sanctions, and rules from the rest of the handbooks, and ranked them 1-56 in alphabetical order of the high school name. The data set for the qualitative content analysis included the rationale for dress code policies, sanctions attached to dress code violations, and the specific dress code rules. Each section was unique in nature and, therefore, was examined separately. The rationale for dress code policies tended to be a short statement and the sanctions were either short statements or had offences ranked from minimum to maximum. The dress code rules themselves were extremely varied and ranged from a few restricted items to pages of prohibited clothing items and grooming practices. The results of each examination gave context to the others, giving the researcher a big-picture look at the dress code policies.

Dress Code Rationale

The researcher analyzed 56 high school dress code rationales. An exploratory examination identified 56 different rationales within the 56 high school rationales, which were then collapsed into six themes. Table 2 listed below reflects the coding procedure used with resulting themes. The six themes were then entered into a table, with their frequency in the statement of rationale recorded per high school. Of the 56

high schools, 21.43% cited *Set Certain Standards*, 66.07% cited *Enhance Classroom Decorum*, 17.86% cited *Increase Academic Success*, 75.00% cited *Distraction-Free Learning Environment*, 66.07% cited *Safe and Secure Learning Environment*, and 21.43% cited *Reflect Life Outside School*.

Table 2

Dress Code Rationale Themes, Including Codes

Set Certain Standards	**Enhance Classroom Decorum**	**Increase Academic Success**
Positive school environment Community values Maintain pride School quality Maintain discipline Set limits Maintain order Maintain spirit	Not revealing Modest Decency Provocative free Properness/promote proper behavior Good taste/tasteful Respectfulness Appropriateness Acceptableness Neatness	Academically focused Productivity Conducive to learning Academic success Unhindered learning environment Maintain Scholarship Seriousness
Distraction-Free Learning Environment	**Safe & Secure Learning Environment**	**Reflect Life Outside School**
Distraction free Interruption free Interference free Disruption free Disturbance free Not extreme Obstruction free learning environment Inhibition-free learning environment Not draw undue attention to wearer Not detract	Harassment free Intimidation free Physical safety Emotional safety Threat free Harmful influence free Health hazard free Provocation free Secure learning environment	Responsible citizen Preparation for work Good citizenship Preparation of success Professionalism Preparation for adult life Preparation for outside working environment

Table 3 listed below reflects these findings. Additionally, 19.64% of the 56 schools had only one out of the six rationale themes listed, 16.64% had two, 41.07% had three, 14.29% had four, 3.57% had two, and 1.79% of the 56 schools had all six themes reflected in their rationale for dress code policies.

Table 3

Dress Code Rationale Totals

	Set Certain Standards	Enhance Classroom Decorum	Increase Academic Success	Distraction Free Learning Environment	Safe & Secure Learning Environment	Reflect Life Outside School
Total	12	37	10	42	37	12
Percentage	21.43	66.07	17.86	75.00	66.07	21.43

Dress Code Sanctions

The researcher analyzed 56 high school dress code sanctions. An exploratory examination identified seven penalties for disobeying the dress code rules, which included changing (either the student wears a loaner garment from the school, the parent delivers a change of clothes, or the student is authorized to go home and change), detention, Saturday school, campus community service, suspension, an undefined possible consequence (such as "The student will be disciplined for violating the dress code policy"), and transfer/expulsion. The seven sanctions were entered into a table to tally the occurrence of each of these penalties in each of the 56 dress code policies.

Of the 56 high schools, 85.71% listed changing the prohibited item as a consequence to violating the dress code, 42.86% listed detention, 28.57% listed Saturday school, 8.93% listed campus community service, 51.79% listed suspension, 42.86% listed an undefined possible consequence, and 10.71% listed either transfer to another school or expulsion as a consequence to dress code violations. Table 4 listed below reflects these findings. Additionally, 25.00% of the 56 high schools had only one out of the six possible sanctions listed, 17.85% had two listed, 25.00% had three, 28.57% had four, 1.79% had five, none of them had six, and 1.79% listed all seven possible sanctions as possible consequences for dress code offenses. The two sanctions that occurred most frequently, changing and suspension, were listed together in 51.79% of the handbooks. Additionally, 46.43% of the high schools had a hierarchal sanction section, with the offenses ranked from first to subsequent.

Table 4

Dress Code Sanction Totals

	Change; Loaner/ Parent Delivery / Go home	Detention	Saturday School	Campus Community Service	Suspen-sion	Undefined Possible Conse-quences	Transfer/ Expulsion
Total	48	24	16	5	29	24	6
%	85.71	42.86	28.57	8.93	51.79	42.86	10.71

Dress Code Rules

The researcher analyzed 56 high school dress code rules, specifically looking at the prohibited items and/or grooming practices. Two hundred eighty-eight

prohibited clothing items, accessories, and grooming practices were identified. The 288 rules were explored and coded as targeting female students, male students, or gender-neutral. Table 5, Table 6, and Table 7 listed below were created to reflect these categories. The tables included the restricted item/grooming practice, the number of handbooks restricting each item, and the percentage of handbooks restricting each item. A fourth column was added to each table to specify whether or not each rule was specific to students of color.

Of the 288 restricted items and grooming practices identified within the 56 dress code policies, 50 were coded as gender neutral (17.36%), three of the neutral rules were coded as targeting students of color (1.04%), 109 were coded as targeting female students (37.85%), one was coded as targeting female students of color (0.35%), 129 were coded as targeting male students (44.79%), and 92 were coded as targeting male students of color (31.94%). Put another way, 96 out of the 288 rules were coded as targeting students of color (33.33%), and 204 out of the 288 restricted items and grooming practices were coded as targeting marginalized students (70.83%). None of the restricted clothing items, accessories, or grooming practices overtly targeted students based on their class status.

Rules targeting female students. Of the 109 rules targeting female students, 9.17% were body part rules, 14.68% were general clothing rules, 12.84% were dress rules, 3.67% were grooming rules, 0.92% were headwear rules, 5.50% were pants rules (including leggings), 20.18% were shorts rules, 13.76% were skirt rules, 17.43% were top rules, and 1.83% of the rules were related to female students' undergarments.

Put another way, there were 10 different body part rules targeting female students listed within the 56 dress code policies, 16 different general clothing rules, 14 different rules specific to dresses, four different grooming rules, one headwear rule, six different rules regarding pants and leggings, 22 different rules regarding shorts, 15 rules pertaining to skirts, 19 rules regarding tops, and two different rules targeted female students' undergarments. The rule specifically targeting female students of color was *Headwear—scarves,* which three different schools cited in their dress code policies (5.36%). Table 5 below reflects these findings.

Table 5

Rules Targeting Female Students

Restricted Item/Grooming Practice	Number of Handbooks Restricting	Percentage	Specific to girls of color
Body parts—back	11	19.64	
Body parts—breasts	1	1.79	
Body parts—chest	4	7.14	
Body parts—cleavage	8	14.29	
Body parts—inappropriate amounts of skin	1	1.79	
Body parts—midsection/midriff	46	82.14	
Body parts—shoulders	4	7.14	
Body parts—sides	3	5.36	
Body parts—skin from waist to armpit	3	5.36	
Body parts—torso	1	1.79	
Clothing—excessively tight	6	10.71	
Clothing—extremely brief	2	3.57	
Clothing—extremely short	1	1.79	
Clothing—fishnet attire	10	17.86	
Clothing greater than 1 size too small	2	3.57	
Clothing—immodest	4	7.14	
Clothing—low backlines	1	1.79	
Clothing—low-cut apparel/necklines	27	48.21	

Clothing—revealing	8	14.29	
Clothing—scoop back	1	1.79	
Clothing—scoop neck	1	1.79	
Clothing—see-through/sheer	29	51.79	
Clothing—sexually provocative	1	1.79	
Clothing—sexually suggestive	3	5.36	
Clothing—skin tight	2	3.57	
Clothing—spandex	6	10.71	
Dresses—backless	1	1.79	
Dresses—distracting	1	1.79	
Dresses—formfitting	2	3.57	
Dresses—off-the-shoulder	1	1.79	
Dresses—one shoulder	1	1.79	
Dresses—revealing	1	1.79	
Dresses—shorter than fingertips	5	8.92	
Dresses—shorter than mid-thigh	2	3.57	
Dresses—shorter than 4” from knee	1	1.79	
Dresses—shorter than 6” from knee	1	1.79	
Dresses—slip dresses	1	1.79	
Dresses—strapless/tube	4	7.14	
Dresses—straps < 2”	1	1.79	
Dresses—reveal buttocks	1	1.79	
Grooming—disruptive hair colors	1	1.79	
Grooming—extreme hair color	1	1.79	
Grooming—unusual hair colors	3	5.36	
Grooming—hair rollers	1	1.79	
Headwear—scarves	3	5.36	x
Leggings—printed yoga style stretch pants	1	1.79	
Leggings—see-through	1	1.79	
Leggings with outwear shorter than 5” above the top of the kneecap	1	1.79	
Leggings without outerwear that adheres to the dress code rules	7	12.50	
Pants—holes that do not adhere to dress code rules	1	1.79	
Pants—low-rise	2	3.57	
Shorts—bike shorts	3	5.36	
Shorts—“bikini” cut shorts	1	1.79	
Shorts—“boy short” cut shorts	1	1.79	
Shorts—form-fitting	2	3.57	
Shorts—inseam < 2”	1	1.79	

Shorts—inseam < 3”	4	7.14	
Shorts—inseam < 3.5”	1	1.79	
Shorts—inseam < 4”	1	1.79	
Shorts—low-rise	1	1.79	
Shorts—revealing	1	1.79	
Shorts—shorter than fingertip length	11	19.64	
Shorts—shorter than mid thigh	11	19.64	
Shorts—shorter than the tip of the thumb	1	1.79	
Shorts—shorter than 2” above the knee	2	3.57	
Shorts—shorter than 6” above knee	1	1.79	
Shorts—shorter than 4” above kneecap	1	1.79	
Shorts—shorter than 5” above kneecap	1	1.79	
Short shorts	8	14.29	
Shorts that attract undue attention	1	1.79	
Shorts that expose the buttocks	3	5.36	
Shorts that reveal inappropriate amounts of skin	1	1.79	
Shorts—tight fitting	1	1.79	
Skirts—formfitting	1	1.79	
Skirts—inappropriate length	1	1.79	
Skirts—low-rise	1	1.79	
Skirts—short	4	7.14	
Skirts—shorter than fingertip length	11	19.64	
Skirts—shorter than mid-thigh	11	19.64	
Skirts—shorter than the tip of the middle finger	1	1.79	
Skirts—shorter than 2” from knee	1	1.79	
Skirts—shorter than 4” from knee	2	3.57	
Skirts—shorter than 6” from knee	1	1.79	
Skirts—split to the point of being indecent	1	1.79	
Skirts that are < 2/3 of the way between the hipbone and knee	1	1.79	
Skirts that attract undue attention	1	1.79	
Skirts that expose the buttocks	3	5.36	
Skirts—un-hemmed	1	1.79	
Tops—backless	11	19.64	
Tops—bandeaus	5	8.92	
Tops—distracting	1	1.79	
Tops—formfitting	1	1.79	
Tops—H-straps	1	1.79	
Tops—halter	28	50.00	

Tops—immodest neckline	1	1.79	
Tops—net shirts	1	1.79	
Tops—off-the-shoulder	20	35.71	
Tops—over-one shoulder	3	5.36	
Tops—racer back	3	5.36	
Tops—revealing	2	3.57	
Tops—sleeveless	1	1.79	
Tops—spaghetti/string straps	20	35.71	
Tops—straps < 1”	9	16.07	
Tops—straps < 2”	11	19.64	
Tops—tank	8	14.29	
Tops—tight blouses showing cleavage	1	1.79	
Tops—tube/strapless	36	64.29	
Undergarments—braless	2	3.57	
Undergarments—perforated clothing without undergarments	1	1.79	
Total Restrictions/Rules=109			1

Rules targeting male students. Of the 129 rules targeting male students, 10.85% were accessory rules, 6.20% were rules pertaining to belts, 8.53% were general clothing rules, 12.40% were rules pertaining to color, 3.89% were footwear rules, 8.53% were rules regarding grooming practices, 17.83% were headwear rules, 5.43% were rules regarding pants, 0.78% were rules regarding shorts, 14.73% were rules pertaining to symbols, and 10.85% of the rules were related to male students’ tops. Put another way, there were 14 different accessory rules targeting male students listed within the 56 dress code policies, eight different belt rules, 11 different general clothing rules, 16 different color rules, five different footwear rules, 11 different rules regarding grooming practices, 23 different headwear rules, seven different rules regarding pants, one rule regarding boys’ shorts, 19 different symbol rules, and 14

different rules targeting male students' tops. Of the 129 rules targeting male students, 71.32% target male students of color. Table 6 below reflects these findings.

Table 6

Rules Targeting Male Students

Restricted Item/Grooming Practice	Number of Handbooks Restricting	Percentage	Specific to boys of color
Accessories—chains	19	33.93	
Accessories—gloves	5	8.93	x
Accessories—grill teeth	2	3.57	x
Accessories—jewelry with drug insignia	1	1.79	
Accessories—jewelry with marijuana leaves	1	1.79	
Accessories—jewelry with razor blades	1	1.79	
Accessories—jewelry with pistols	1	1.79	
Accessories—lanyard that hangs below shirt level	1	1.79	x
Accessories—long chains	1	1.79	
Accessories—masks	3	5.36	x
Accessories—sunglasses	15	26.79	x
Accessories—suspenders off shoulders	2	3.57	
Accessories—wallet chains	15	26.79	
Accessories—weapon-like jewelry	1	1.79	
Belts—buckles with initials	13	23.21	x
Belts—buckles with numbers	1	1.79	x
Belts—canvas military style belts	3	5.36	x
Belts—double buckle	1	1.79	
Belts—excessive metal	1	1.79	x
Belts—hanging/dangling belts	19	33.93	x
Belts—metal	1	1.79	
Belts—oversized belt buckle	2	3.57	x
Clothing—athletic wear	1	1.79	
Clothing—excessively/overly baggy	15	26.79	x
Clothing—gang associated	46	82.14	x
Clothing greater than 1 size too big	3	5.36	x
Clothing—Hornee Industries brand	1	1.79	
Clothing—military/paramilitary/camouflage	2	3.57	

Clothing—overalls without both straps buckled	6	10.71	x
Clothing—overalls without shirt	2	3.57	x
Clothing—oversized	6	10.71	x
Clothing—socks pulled up to knees with shorts worn below the knee	8	14.29	x
Clothing—trench coats	3	5.36	
Color—black beanies	1	1.79	x
Color—blue belts	2	3.57	x
Color—blue laces	1	1.79	x
Color—blue shirts	1	1.79	x
Color—blue shoes	1	1.79	x
Color—blue socks	1	1.79	x
Color—multiple items of red	1	1.79	x
Color—navy beanies	1	1.79	x
Color—red beanies	1	1.79	x
Color—red belts	2	3.57	x
Color—red laces	1	1.79	x
Color—red shirt	1	1.79	x
Color—red shoes	1	1.79	x
Color—red socks	1	1.79	x
Color—shoes with red or blue	1	1.79	x
Color—wearing two or more items of the same color	1	1.79	x
Footwear—combat boots	2	3.57	
Footwear—high top boots	2	3.57	
Footwear—lace-up boots	2	3.57	
Footwear—military style boots	2	3.57	
Footwear—steel-toed	11	19.64	
Grooming—beards	1	1.79	
Grooming—combs worn in hair	1	1.79	x
Grooming—distracting mustache styles	1	1.79	
Grooming—faux-hawks	1	1.79	
Grooming—faux-hawks that rise above the scalp > 2”	1	1.79	
Grooming—letters/messages/unusual designs/unusual symbols shaved into hair	4	7.14	x
Grooming—mohawks	2	3.57	
Grooming—razor cuts in eyebrows	1	1.79	x
Grooming—sideburns wider than 1” or longer than earlobe	1	1.79	

Grooming—unusual hair designs	4	7.14	x
Grooming—unusual razor cuts	1	1.79	x
Headwear—backwards hats	4	7.14	x
Headwear—bandanas	29	51.79	x
Headwear—beanies	5	8.93	x
Headwear—buffs	1	1.79	x
Headwear—caps	10	17.86	x
Headwear—do rags	13	23.21	x
Headwear—hairnets	18	32.14	x
Headwear—hats	29	51.79	x
Headwear—hats with area codes	1	1.79	x
Headwear—hats with neighborhood	2	3.57	x
Headwear—hats with spikes	1	1.79	x
Headwear—hats with street names	2	3.57	x
Headwear—hats with XIV logo	3	5.36	x
Headwear—hats worn to the side	4	7.14	x
Headwear—headbands	5	8.93	x
Headwear—head coverings	8	14.29	x
Headwear—hoods	10	17.86	x
Headwear—skull caps	2	3.57	x
Headwear—stocking caps	1	1.79	x
Headwear—sweatbands	1	1.79	x
Headwear—t-shirts on head	2	3.57	x
Headwear—towels on head	2	3.57	x
Headwear—wave caps	4	7.14	x
Pants—baggies wider than 5” long	1	1.79	x
Pants—oversized	8	14.29	x
Pants—sagging	22	39.29	x
Pants that rest below the waist	27	48.21	x
Pants that sag at the crotch even when they fit at the waist	1	1.79	x
Pants—un-hemmed	4	7.14	x
Pants with extra long crotch extending beyond mid thigh	3	5.36	x
Shorts that rest below the waist	7	12.50	x
Symbols—area codes	2	3.57	x
Symbols—confederate flags	1	1.79	
Symbols—images on shirts that do not meet the dress code	1	1.79	
Symbols—iron cross	1	1.79	
Symbols—items with “N”	1	1.79	x

Symbols—items with “Player 69” logo	2	3.57	
Symbols—items with “S”	1	1.79	x
Symbols—items with “13”	4	7.14	x
Symbols—items with “14”	3	5.36	x
Symbols—items with “187”	1	1.79	x
Symbols—large red stars	1	1.79	x
Symbols—lightning bolt script of double SS	1	1.79	
Symbols—naked silhouettes	1	1.79	
Symbols—numbered items	1	1.79	x
Symbols—Old English lettering	1	1.79	x
Symbols—Playboy	3	5.36	
Symbols—professional sports teams	9	16.07	x
Symbols—Scar Face attire	1	1.79	
Symbols—swastikas	2	3.57	
Tops—absence of shirt	6	10.71	
Tops—athletic tank tops	1	1.79	x
Tops—bereavement shirts	1	1.79	x
Tops—Cali shirts	1	1.79	x
Tops—muscle shirts/open sides	14	25.00	
Tops—oversized shirts	2	3.57	x
Tops—oversized shirts reaching beyond wrists	1	1.79	x
Tops—oversized white t-shirts creased down the front	1	1.79	x
Tops—oversized white t-shirts with creased sleeves	1	1.79	x
Tops—shirts worn with only one arm through the armholes	2	3.57	x
Tops—sports jerseys	1	1.79	x
Tops—undershirts	8	14.29	x
Tops—underwear-type sleeveless shirts	4	7.14	x
Tops—un-tucked shirts extending beyond mid-thigh	2	3.57	x
Total Rules/Restrictions=129			92

Gender neutral rules. Of the 50 gender-neutral rules, 28.00% were accessory rules, 2.00% were belt rules, 14.00% were general clothing rules, 10.00% were footwear rules, 12.00% were grooming rules, 6.00% were headwear rules, 2.00% were

rules pertaining to grooming practices, 6.00% were headwear rules, 2.00% were rules regarding pants, 6.00% were rules regarding shorts, 14.00% were symbol rules, 2.00% were rules pertaining to tops, and 4.00% were gender-neutral undergarment rules. Put another way, there were 14 different gender-neutral accessory rules, one belt rule, seven general clothing rules, five rules pertaining to footwear, three different headwear rules, one rule regarding pants, three different shorts rules, seven different symbol rules, one rule regarding tops, and two gender-neutral undergarment rules. Three of the grooming rules, *Grooming—disruptive hairstyles, Grooming—extreme hairstyles,* and *Grooming—hairstyles that obstruct vision* (6.00%), were coded as targeting students of color, both male and female.

Table 7

Gender Neutral Rules

Restricted Item/Grooming Practice	Number of Handbooks Restricting	Percentage	Specific to students of color
Accessories—ball earrings	1	1.79	
Accessories—collars	6	10.71	
Accessories—ear gages	2	3.57	
Accessories—excessive jewelry	1	1.79	
Accessories—items with studs	8	14.29	
Accessories—oversize jewelry	1	1.79	
Accessories—rings joining 2 or more fingers	1	1.79	
Accessories—safety pins	1	1.79	
Accessories—sharp	2	3.57	
Accessories—spiked bracelets	3	5.36	
Accessories—spiked collars	3	3.36	
Accessories—spiked rings	3	5.36	
Accessories—spikes	15	26.79	

Accessories—unsafe	5	8.93	
Belts—spiked	1	1.79	
Clothing—beachwear	3	5.36	
Clothing—extreme fashion	2	3.57	
Clothing—frayed/cut/torn/ or with holes	13	23.21	
Clothing—items with writing	2	3.57	
Clothing—pajamas	20	35.71	
Clothing—swimwear	7	12.50	
Clothing—unsafe	5	8.93	
Footwear—bare feet	36	64.29	
Footwear—flip flops	3	5.36	
Footwear—roller blades	1	1.79	
Footwear—shoes with wheels	3	5.36	
Footwear—slippers/soft sole	22	39.29	
Grooming—disruptive hairstyles	2	3.57	x
Grooming—extreme hairstyles	2	3.57	x
Grooming—hairstyles that obstruct vision	1	1.79	x
Grooming—piercings other than ear lobes	4	7.14	
Grooming—unsafe	2	3.57	
Grooming—visible tattoos	2	3.57	
Headwear—shower caps	1	1.79	
Headwear—tams	1	1.79	
Headwear—visors	1	1.79	
Pants—sweats	2	3.57	
Shorts—athletic shorts	2	3.57	
Shorts—cutoffs/un-hemmed	6	10.71	
Shorts—gym shorts	3	5.36	
Symbols—drugs/alcohol/tobacco	53	94.64	
Symbols—graphics that degrade the integrity of an individual or group	33	58.93	
Symbols—items with pictures	1	1.79	
Symbols—profanity/obscenity/crude/vulgar	36	64.29	
Symbols—promotes illegal behavior	1	1.79	
Symbols—sexual expressions/actions/images	43	76.79	
Symbols—violence/weapons/reference to violent behavior	34	60.71	
Tops—printed t-shirt	2	3.57	

Undergarments—none	2	3.57	
Undergarments—visible	44	78.57	
Total Rules/Restrictions=50			3

As stated previously, Table 5, Table 6, and Table 7 depict the restricted item and/or grooming practice, the number of dress code policies that list each item and/or grooming practice, and the percentage at which said rules occur within the 56 dress code policies analyzed. For example, 82.14% of the schools listed *Clothing—gang associated* as a prohibitive dress code rule, 64.29% of the schools listed *Footwear—bare feet* as a prohibitive dress code rule, and 82.14% of the school listed *Body parts—midsection/midriff* as a prohibitive dress code rule. The researcher used the same wording at the handbooks' dress code policies. For example, *Clothing—excessively tight, Accessories—items with studs,* or *Clothing—socks pulled up to knees with shorts worn below the knee* were recorded directly from the rhetoric used in the handbooks. Additionally, all 56 of the dress code policies analyzed had proscriptive rules, which outlined items of clothing and grooming practices that were unacceptable. One of the 56 schools had both proscriptive and prescriptive rules, which provide the students with guidelines of what is acceptable to wear to school (Workman & Freeburg, 2006).

As mentioned above, there were 22 different rules regarding girls' shorts identified within the 56 high school dress code policies analyzed. The prohibited shorts styles listed within the policies included shorts that were form-fitting (3.57%), shorts that were revealing (1.79%), shorts that attract undue attention (1.79%), shorts that expose the buttocks (5.36%), shorts that reveal inappropriate amount of skin

(1.79%) or shorts that were tight-fitting (1.79%). Twelve out of the 22 rules related to girls' shorts were in associated with the length of the shorts. The occurrence of these short-length rules within the 56 schools was 76.79% and ranged from inseam rules, to fingertip rules, to above the knee rules. Additionally, the discourse used throughout the policies involved words like "inappropriate amounts of skin," "excessively tight," "immodest," "revealing," "sexually provocative," "sexually suggestive," "distracting," "skin tight," and "indecent." Again, these types of proscriptive rules were coded as targeting female students.

Race and male students. The dress code rules targeting male students of color were items of clothing, accessories, or grooming practices perceived as being associated with gang activity. In fact, 82.14% of the schools listed "gang associated" clothing as prohibited. Of the gang associated clothing items that were unacceptable were rules regarding the size of the students' clothing and their grooming practices. Sixteen rules focused on oversized clothing, such as baggy, sagging pants or shorts and oversized T-shirts. In total, the 56 high schools analyzed had prohibited oversized clothing listed 118 times. On average, each high school had at least two rules about oversized clothing. Additionally, there were eight different rules that targeted hairstyles typically worn by Black boys. These hairstyles were listed within the 56 high school dress code policies 16 times are included combs worn in hair, designs shaved into hair, and razor cuts in eyebrows. Overall, the prohibited items associated with boys of color were very specific, such as "hats with XIV logo" and "red socks." There were four prohibited symbols associated with white supremacists groups listed

five times within the 56 schools—the confederate flag, the iron cross, lighting bolt script of double SS, and swastikas.

Summary

The data from this study was extracted from 56 California high school handbooks and each section of the dress code policies were analyzed individually. The content of the three sections were analyzed to determine what the dress code rationales were, what the sanctions attached to dress code violations were, and how many of the dress code rules target marginalized students. The analysis of dress code rationales resulted in six different themes, with the most common rationale being *Distraction-Free Learning Environment* (75%). The analysis of dress code sanctions resulted in seven different penalties for dress code offenses, with the requirement to change the offending article being the most common punishment (85.71%). The analysis of dress code rules resulted in the identification of 288 different prohibited items and grooming practices, the majority of which targeted marginalized students (70.83%), as shown in Table 8 below.

Table 8

Dress Code Rules Totals

	Total	Percentage
Rules Targeting Female Students	109	37.85
Rules Targeting Female Students of Color	1	0.35
Rules Targeting Male Students	129	44.79
Rules Targeting Male Students of Color	92	31.94
Gender Neutral Rules	50	17.36
Gender Neutral Rules Targeting Students of Color	3	1.04
Total Rules Targeting Marginalized Students	204	70.83

Chapter 5

DISCUSSION, CONCLUSION, LIMITATIONS, AND RECOMMENDATIONS

Discussion

This study was designed to analyze California high school dress code policies to determine what the rationale for dress code policies were, what the sanctions attached to dress code violations were, and how many of the specific dress code rules targeted already marginalized students, such as girls and students of color. The investigation of dress code policies provided a comprehensive look at dress code policies, as they are written, and gave the researcher an understanding of how the three sections of dress code policies are interrelated in terms of student identity, bodily discipline, and control. This study endeavored to add to the field of academic research as it pertains to gender and race by demonstrating how school administrators perpetuate institutionalized sexism and racism through high school dress code policies.

Dress Code Rationale

The results of this section of the analysis indicate that the majority of dress code rationales came from three out of the six themes: *Enhance Classroom Decorum* (66.07%), *Distraction-Free Learning Environment* (75.00%), and *Safe and Secure Learning Environment* (66.07%). Each of these rationales, although acceptable in the eyes of the courts (Freeburg et al., 2004), has gendered and/or racial undertones. Decorum in the classroom, according to the data, is defined by modesty, tastefulness, and propriety. As stated in the Oak Grove High School student handbook, "Modesty and avoidance of distracting influences are keys to appropriate appearance" (p. 31). In

1972, the court in *Wallace v. Ford* set modesty rules regarding clothing items worn by female students. Girls' pants that were regarded as too tight and girls' skirts that were deemed as either too tight or too short (or both) were labeled "immodest" and "suggestive" (Whisner, 1982, p. 107). The *Wallace* court set a precedent in demonstrating that it is not the article of clothing that is immodest, rather how it looks on the body that is wearing it. Therefore, the burden of classroom decorum lies with the schools' female students.

The dress code rationale emphasizing the importance for students to have a distraction-free learning environment also has gendered implications. A distraction-free learning environment, according to the data, is defined as being distraction free, disruption free, and free of any clothing or grooming practices that draw undue attention to the wearer. The battle for female students' right to wear jeans to school in the 1970s was centered around the argument that girls wearing pants would attract excessive attention and therefore be a distraction for other students (Whisner, 1982). The court's ruling in *Bannister v. Paradis* (1970) deemed that the school's prohibition of blue jeans for male students was unconstitutional. Yet, the court upheld the prohibition of pants for female students as constitutional. The reason being that scantily clad students would distract other students and be disruptive of school discipline and the educational process (Whisner, 1982). The fact that jeans worn on the male body was permissive, but jeans worn on the female body was disruptive demonstrates the gendered application of dress code policies. In the educational

setting, female students are required to take additional steps to ensure that they are not disrupting the learning environment at school (Glickman, 2016).

The dress code rationale emphasizing the importance for students to have a safe and secure learning environment is rooted in racist notions of dress and appearance. A safe and secure learning environment, according to the data, is defined as a learning environment that is free of threat, intimidation, and harassment. Between 1992 and 1996, twelve states passed laws giving school districts the authority to enforce dress codes and uniform policies for students. Of those twelve states was California, which stated that dress codes would improve the safety, security, and behavior of students and help solve the problem of increased weapons and violence in schools (DeMitchell et al., 2000). Weapons and violence at school are linked to gang activity, and perceived gang involvement is linked to Black and Latino boys. Black and Latino boys are seen by school authorities as threatening, dangerous, and hyper-masculine (Morris, 2005). Therefore, dress code policies that rationalize stereotyping black and brown boys as violent threats to the safety of the school perpetuate racist dress codes.

Dress Code Sanctions

The results of this section of the analysis indicate that a student's dress is more important than time spent in class. The punishments for dress code violations varied from changing the offending garment (85.71%), to detention (42.86%), to Saturday school (28.57%), to campus community service (8.93%), to suspension (51.79%), to expulsion or transfer to another school (10.71%). Twenty-four out of the 56 schools

had an undefined or ambiguous consequence listed (42.86%). The bulk of these sanctions have the loss of instructional time in common. The majority of the policies analyzed listed changing as the first offense to dress code violations. This seemingly innocuous rule results in lost class time, especially for female students. According to the Norwalk High School student handbook, "Students out of compliance with the SJHHS standards, on the first offense, will be detained in CSI until a change of clothing can be arranged. A 'loaner' garment will be offered. On subsequent offences, parents will be contacted to provide a change of clothing. Students will be kept in CSI until the parent can provide a change of clothing" (p. 9). The offending clothing worn by male students can easily be corrected by removal of a hat or pulling up sagging pants. Female students cannot take off their dress or shirt and continue to class, so they are removed from class until they can change.

Suspension as a punishment for dress code violations was the second highest majority, with 29 out of the 56 schools listing in-school or out-of-school suspension as a dress code sanction (51.79%). This finding is supported by the research, in which out-of-school suspensions are the most widely used disciplinary tool for controlling student behavior, even for minor offenses like dress code violations (Simson, 2014). The loss of instructional time associated with out-of-school suspensions is "an important predictor of achievement outcomes" (Simson, 2014, p. 516). In fact, any time instructional time is lost, the academic development of students is hampered, diminishing their probability of success. Empirical data collected over the last three decades have continually found that school disciplinary actions disproportionately

affect students who are already marginalized, such as girls and students of color (Simson, 2014). When a student violates the dress code policy, school officials "can impose a variety of disciplinary mechanisms including suspension or expulsion" (Glickman, 2016, p. 279). This study found that 10.71% of the schools analyzed listed expulsion or transfer as a possible consequence of repeated dress code violations.

Dress Code Rules

The results of this section of the analysis indicate that the dress code rules disproportionately target marginalized students. With 70.83% of the prohibited dress and grooming practices targeting all girls and Black and Brown boys, high school dress code policies create and maintain hegemony. The construction of social categories like gender and race are perpetuated through institutions like school, which uphold the status quo (Zambrana, 1988). Dress code policies, as this study revealed, are a tool used to preserve the white, heterosexual, middle-to upper-class, cisgendered male (Glickman, 2016). When high schools assign meaning to certain articles of clothing worn on certain student bodies, they are openly displaying the racism and sexism that is present within that institution (Zambrana, 1988). Dress code policies are a mechanism of social control to which marginalized students are unable to easily conform to (McKellar, 1989). Because female students are not male, female students of color are not male and also not white, and Black and Latino boys are not white, these students are held to inequitable standards.

Dress code policies of the 1960s and 1970s were focused on students properly performing their gender. Binary gender distinctions were the focus of dress code rules

in past decades, with male students prohibited from having long hair and female students prohibited from wearing pants (Whisner, 1982). This study demonstrated a shift in dress code rules, with the focus moving away from gender distinctions and towards reducing a female student's perceived sexuality and male students' perceived threat to safety. This study found that the rules targeting female high school students were overwhelmingly centered around how the clothing items look on the female body. Therefore, girls were seen as hypersexual and potentially distracting for other students. The rules targeting male students of color were centered around specific clothing items, accessories, and grooming practices. Hence, boys of color, specifically Black and Latino boys, were seen as hyper-masculine and potentially violent.

The rules targeting female students' mode of dress and grooming were reflective of the schools' views on the female body, with the implicit primary goal of containing female sexuality. Current popular discourse on the need for school dress codes indicate concern over girls' revealing clothing, their sexuality, and therefore the performance of gender roles (Raby, 2004). However, it is not the clothing that is considered sexually suggestive, but how certain articles of clothing look on certain student bodies. This study found that 37.85% of the total dress code rules targeted high school girls. The discourse used throughout the dress code policies placed the responsibility and blame on the female students to preserve a distraction-free learning environment that maintains decorum. Prohibitive rules that stressed the absence of clothing that was "inappropriate," "immodest," "revealing," and "indecent" demonstrated that the female body is considered inherently sexual and in need of

covering. This type of rhetoric places the burden on young girls to control the reactions others have to their developing bodies (Glickman, 2016; Raby, 2010).

According to Glickman (2016), dress code rules, like gender, are socially constructed. In other words, the meaning assigned to certain articles of clothing are constructed through social rules like dress code policies. For example, shorts with an inseam that is less than 4 inches alone does not signify that the shorts are sexually suggestive. It is when they are worn on the female body that the meaning is changed. Shorts that are considered modest normalize certain expressions of femininity, while shorts that are considered immodest problematize others (Raby, 2010). Of the 56 dress code policies analyzed, there were 22 different rules surrounding prohibited styles of shorts. Twelve out of the 22 rules related to girls' shorts were associated with the length of the shorts. The occurrence of these short-length rules within the 56 schools was 76.79% and ranged from inseam rules, to fingertip rules, to above the knee rules. These findings demonstrate that not only do girls have to consider that they think is comfortable and appropriate for their bodies, but what male students and school staff consider to be appropriate, modest, and decent. Ultimately, though, the current climate on high school campuses indicate that what others think of girls' bodies is more important than what they are comfortable wearing.

Of the 109 rules that targeted female students, one was coded as targeting female students of color (0.35%). Three out of the 56 schools (5.36%) listed *Headwear—scarves* as a prohibited item of clothing. Because headscarves are worn predominantly by women of color, this rule unfairly targets Black girls and Muslim

girls. However, 14.29% of the schools stated that headwear that qualified for a religious or medical exemption was allowed. There were no mentions of cultural exemptions, which would allow Black girls to wear an African head wrap. While there was only one prohibited item that targeted female students of color, this study did not examine disproportionate disciplinary procedures that target Black and brown girls. The schools analyzed consider dress code violations a minor offense, but according to Morris and Perry (2017), Black girls are more than three times likely to be disciplines for minor offenses. Additionally, Rolon-Dow (2004) and Morris (2005) found that Puerto Rican and Black girls were frequently perceived by school staff as being hypersexual and subverted traditional forms of femininity. This study's findings regarding the concern over modesty and decency in the dress code rules is in line with the views school staff have of Black girls and Latina students (Morris, 2005; Rolon-Dow, 2004).

This study's findings surrounding male students were just as disheartening—44.79% of the rules targeted male students, however 31.94% target male students of color. The dress code rules targeting male students of color were items of clothing, accessories, or grooming practices perceived as being associated with gang activity. In fact, 82.14% of the schools listed "gang associated" clothing as prohibited. Of the gang associated clothing items that were unacceptable were rules regarding the size of the students' clothing and their grooming practices. Sixteen rules focused on oversized clothing, such as baggy, sagging pants or shorts and oversized T-shirts. In total, the 56 high schools analyzed had prohibited oversized clothing listed 118 times.

On average, each high school had at least two rules about oversized clothing. The issue surrounding oversized clothing in high school dates back all of the way to the 1990s when a male student sued the Albuquerque Public Schools for the right to wear sagging pants to school. The judge in this 1995 case sided with the school district, claiming that sagging pants was an act of defiance not constitutionally protected under the First Amendment (DeMitchell et al., 2000). Sagging, oversized pants were and are wrongly associated with gang activity and seen as a problem dress codes could fix.

Grooming rules prohibited by male students in the policies analyzed focused on hairstyles traditionally worn by Black and Latino boys. There were eight different rules that targeted hairstyles typically worn by Black and Latino boys. These hairstyles were listed within the 56 high school dress code policies 16 times and included combs worn in hair, designs shaved into hair, and razor cuts in eyebrows. Similarly, hairstyles popular among Black students were banned in a Chicago area school in 1996 because school staff said those hairstyles symbolized gang activity (Crockett & Wallendorf, 1998). According to high school teachers and administrators, Black and Latino boys are often labeled as dangerous and violent based on the way that they wear their hair. Morris' 2005 study found that students who were suspected of gang activity by school staff at the middle school where Morris (2005) was performing his study were usually Black and Latino boys. This perception by school staff was based on their clothing—more importantly, how their clothing and grooming practices looked on their bodies. Even when gang markers were not openly displayed,

Black and Latino boys were still seen as having the potential for gang activity and violence (Morris, 2005).

Two high schools within this study did list prohibited items associated with violence and racism—and targeted white males. There were four prohibited symbols associated with white supremacist groups listed five times within the 56 schools—the confederate flag, the iron cross, lighting bolt script of double SS, and swastikas. These items of dress were not classified as gang-related in the two high schools that listed them as prohibited. These findings are supported by a content analysis of newspaper and magazine articles that looked at the purported increase in school violence in the late 1990s. Crockett and Wallendorf (1998) found that school violence was not a new problem in schools, but a well-established one. What had changed was the discourse used to describe incidents of violence on campus. Violence committed by white students was considered bullying in media stories, while violence committed by nonwhite students was considered gang related (Crockett & Wallendorff, 1998). Therefore, if a white male student wearing an iron cross exhibited violent behavior, they would likely be considered a bully and not a gang member.

The tendency of high school staff to view female students as hypersexual distractions and male students of color as threatening disruptions leads to teachers and school administrators subjecting already marginalized students to "constant surveillance and bodily discipline" (Morris, 2005, p. 36). With sagging pants seen as willful defiance by the courts (DeMitchell et al., 2000), dress codes are used as a social control mechanism to preserve the status quo (Glickman, 2016). Dress code

rules are used as a tool to regain control over perceived disobedience from students. According to Morris (2005), one of the participants in his study, a white female teacher, stated that dress codes were "'an easy way for teachers to assert their authority over the kids and make it look like they have control'" (p. 42). Based on the findings of this study, it appears that school staff find it most necessary to have control over female students and males students of color. Therefore, dress codes and their patterns of enforcement create and maintain hegemony.

Conclusion

Content analysis of the 56 California high school dress code policies found that the rules and rationales disproportionately target students based on their race and gender. The sanctions attached to dress code violations result in lost instruction time, which means that students are losing valuable learning time because of their appearance. Girls of color, boys of color, and white girls are further oppressed and marginalized through the dress code policies and enforcement of said policies. It is easy to think the solution to the problems is for students to just follow the rules, but as this study has demonstrated, the rules are quite subjective. According to the Natomas High School student handbook, "Administrators will use their own discretion in deciding what is disruptive to the educational environment" (p. 15). High school administrators, then, have the green light to write, create, and enforce dress code rules based on their own subjective views of what is disruptive to the learning environment. It is the researcher's conclusion that dress codes work to preserve the status quo and ensure that marginalized students remain oppressed.

Limitations

The limitations of the study include the sample size and the methodology. Not every California high school had their student handbooks publicly accessible, which had an effect on the sample size. Additionally, even when a student handbook was available to the public, it was not always the most up to date version. Nineteen of the handbooks had to be omitted because they were missing one or more sections required to answer the research questions. Because this study is a content analysis, the researcher only analyzed the policies, not the implementation of said policies. Whether or not high school administrators and teachers followed the guidelines set forth in the handbooks was unknown. In addition to the sample size and methodology, the researcher acknowledged that they were "working within hermeneutic circles in which their own socially or culturally conditioned understandings constitutively participate" (Krippendorff, 2013, p. 23) in the analysis and interpretation of the data. The researcher's background in women and gender studies made it impossible to be completely unbiased, therefore the researcher acknowledges their subjective reflexivity (Creswell, 2015). Additionally, the researcher's standpoint as a white woman implicitly influenced their interpretation of the findings.

Recommendations

In order to create a more equitable atmosphere on high school campuses, there needs to be an equitable dress code policy. The adoption of an inclusive dress code policy, which moves away from proscriptive dress code policies to prescriptive dress code policies, would leave behind inequitable rules and enforcement that relies on

shame and students' missed class time. A high school in Evanston, Illinois has recently gone viral for the implementation of an updated dress code policy, which "explicitly prohibits decisions and language that shame students" (Stevens, 2017, para. 8). The new dress code policy begins by stating that "'staff shall enforce the dress code consistently and in a manner that does not reinforce or increase marginalization or oppression of any group based on race, sex, gender identity, gender expression, sexual orientation, ethnicity, religion, cultural observance, household income, or body type/size'" (as cited in Stevens, 2017, para. 20). Evanston Township High School's inclusive dress code explicitly allows common offenders like hoodies, hats, leggings, halter tops, and spaghetti strap tank tops. Additionally, this updated dress code comes after prolonged complaints from students to school administrators about the disproportionate enforcement of dress code policies which punished students of color for dress code offenses more often than white students and punished students whose bodies were more developed for wearing clothing that other students wore without reprimand (Stevens, 2017).

An inclusive dress code policy, such as Evanston Township High School, highlights to students what they can wear and also provides a blueprint for school staff to follow when enforcing the dress code. Rationales for a distraction-free learning environment and rules that focus on girls' bodies as sexually provocative or Black boys' bodies as intimidating or threatening were replaced by inclusivity and gender/racial equity. Further research should explore student perceptions of inclusive dress code policies versus traditional dress code policies. Additionally, future research

should compare the discipline rates between traditional and inclusive dress code policies, while examining student demographics. The researcher hopes to develop an inclusive dress code policy, like the one implemented in Evanston Township High School, and present it to high school administrators, teachers, parents, and students. The proposed policy, coupled with the present research, would likely garner positive acceptance by the school staff, parents, and students.

Reflections

The purpose of this study was to examine the rules, rationales, and sanctions within 56 California high school dress code policies to determine if they perpetuate gender disparities in education. The researcher originally hypothesized that the findings of this study would uncover the tendency of high school dress code policies to sexualize the female body. However, the study revealed that male students of color are scrutinized for their appearance just as much as female students are—except they are seen as threatening and violent. Female students and male students of color are policed for their dress and appearance in ways that white male students are not. Inequitable dress code policies that disproportionately target and, therefore, negatively affect already marginalized students perpetuate hegemonic values and preserve gender inequality in education (Glickman, 2016).

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